

IMO III 12 Meeting Summary

11 August 2026



The 12th session of the IMO's Sub-Committee on Implementation of IMO Instruments (III 12) was held from 20 to 24 July 2026 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 Casualty Investigation
WG 2	Working Group on Port State Control
WG 3	Working Group on Survey Guidelines under the HSSC, the Non-exhaustive list of obligations, and Guidance on the ISM Code
DG	Drafting Group on Analysis of Consolidated Audit Summary Reports

Statements

III 12 noted a series of statements by Member States and observers concerning recent security incidents affecting commercial shipping in the Black Sea, the Sea of Azov, and the Strait of Hormuz, as well as broader issues relating to the protection of vital shipping lanes. Delegations presented differing views on the causes of the incidents and the applicable legal framework, reported recent attacks on merchant ships and their consequences for seafarers, and emphasized issues including the safety and security of navigation, freedom of navigation, search and rescue cooperation, respect for international law, and the protection of civilian shipping. Several delegations expressed condolences for affected seafarers, condemned attacks against commercial vessels, called for de-escalation and dialogue, or reaffirmed support for relevant Council decisions. III 12 commended the Secretary-General's ongoing efforts to address threats to commercial shipping and invited him to continue those efforts, with particular emphasis on the safety and well-being of seafarers. III 12 also addressed the deteriorating security situation in the Red Sea and Gulf of Aden, while the Secretary-General urged flag States, operators and shipowners to take necessary precautions and conduct thorough risk assessments before transit, emphasizing freedom of navigation, de-escalation and seafarer safety.

Reception facility

Annual reports on port reception facilities for 2024 and 2025

III 12 reviewed the annual enforcement report on alleged inadequacies of port reception facilities for 2025, compared it with the 2024 results, and urged Parties to MARPOL to strengthen mandatory reporting and maintain up-to-date information in the GISIS port reception facilities module.

Casualty analysis

Lessons learned from marine casualty case studies

III 12 agreed to proceed with the Lessons Learned from marine casualties for approval, issuance as an III.3 circular and release on the IMO public website.

(<https://www.imo.org/en/OurWork/MSAS/Pages/Casualties.aspx>).

III 12 also requested the Secretariat to continue promoting the Lessons Learned through IMO social media platforms, including the use of visual representations to enhance outreach to seafarers and the wider maritime community.

Analysis of incidents of ruptured high-pressure cylinders

III 12 approved a III.3 circular on *the Analysis of Incidents of Ruptured High-pressure Cylinders*, highlighting corrosion, overpressure, inadequate inspection and poor record-keeping as the principal factors contributing to cylinder failures.

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

III 12 agreed to invite MSC 112 to establish a new output on fire standards for cargo handling spaces of specialized self-unloading bulk carriers, with the Sub-Committee on Ship Systems and Equipment (SSE) designated as the coordinating organ, following an ATSB investigation into cargo space fires on such ships.

Risks involved with wearing inflatable lifejackets

III 12 agreed to invite MSC 112 to establish a new output to address risks associated with wearing inflatable lifejackets, including amendments to the LSA Code, the Revised recommendation on testing of life-saving appliances (resolution MSC.81(70)) and the Model Regulations on Domestic Ferry Safety.

Marine safety investigation reports and Quality of marine safety investigation reports

III 12 approved the release of the analysis of 59 marine safety investigation reports in GISIS and a III.3 circular *on the quality of investigation reports*, noting that although 25 reports did not fully meet the quality criteria, they still contained valuable safety lessons, while requesting the Secretariat to reflect the identified quality concerns in future technical cooperation activities.

MCI module enhancements on GISIS

III 12 noted that future enhancements to the GISIS Marine Casualties and Incidents (MCI) module would be considered as part of the ongoing GISIS review and data management project, while emphasizing the importance of improving data quality through more comprehensive reporting, complete taxonomy entries and enhanced data exchange with national and regional systems.

Potential impact on the current regulatory framework

Safety issues identified relevant to the ISM Code

III 12 discussed safety issues arising from the MV Dali casualty investigation, reaffirmed that effective implementation rather than amendment of the ISM Code remained the primary challenge, while supporting further consideration of proactive, predictive and data-driven safety management principles as part of the ongoing revision of the ISM Code implementation guidelines.

Data analysis of marine casualties and incidents***Passenger and container ship casualty analysis undertaken by WMU***

III 12 noted updated statistical analyses of passenger and container ship casualties, authorized the publication of the studies on the IMO public website, and agreed that further recommendations should be developed based on the findings. III 12 welcomed the refined studies undertaken by the World Maritime University (WMU) and recommended that the Secretariat undertake a final review to address the remaining data limitations and methodological issues prior to publication, thereby supporting a more accurate interpretation of the findings.

Accidents related to enclosed spaces and falls on board ships

III 12 noted analyses of accidents related to enclosed spaces and falls on board ships, emphasizing the importance of timely casualty reporting, stronger human element initiatives, improved casualty and near-miss data collection, and practical safety tools to enhance the application of lessons learned.

Revision of the casualty investigation code

III 12 initiated the review of the Casualty Investigation Code (CIC) and its associated implementation Guidelines, recalling MSC 110's instruction that the work should focus primarily on improving the quality and timeliness of casualty investigations and reports. During the initial discussion, there was broad support for preserving the CIC's fundamental objective of preventing future casualties rather than attributing blame or liability, while maintaining a high-level and flexible framework compatible with different national legal systems. Delegations also supported considering a number of potential improvements, including clearer terminology and definitions, strengthened treatment of safety issues, enhanced investigator capacity-building. III 12 agreed to refer the detailed review of the CIC and its associated implementation Guidelines to a Correspondence Group.

Port State Control (PSC)**Analysis of PSC activities, practices and statistics**

III 12 noted that total PSC inspections increased from 90,381 in 2024 to 96,255 in 2025, while the overall detention rate increased from 3.00% to 3.32%. Ballast Water Management was the principal coordinated concentrated inspection campaign in 2025, while several PSC regimes also strengthened measures against fraudulent ship registrations, false flags and fraudulent certificates. III 12 further noted continued expansion of training and technical cooperation activities and enhanced data exchange among PSC regimes.

PSC Guidelines on the ISM Code and certification of seafarers, manning and hours of rest

III 12 noted that MSC 111 had referred the issues identified during the review of the PSC Guidelines to the IMO Sub-Committee on Human Element, Training and Watchkeeping (HTW) for consideration as part of its ongoing review of fatigue and seafarers' hours of work and rest. III 12 also reaffirmed that PSC authorities were not responsible for determining minimum safe manning or assessing the adequacy of safe manning documents issued by flag States. Any underlying shortcomings should instead be addressed through the wider regulatory framework governing manning, fatigue and hours of work and rest.

Guidance for PSC officers on inspection for ships' machinery and maintenance

III 12 considered a proposal to develop harmonized guidance for port State control officers on inspections of ships' machinery and maintenance. While there was broad support for improving the consistency and effectiveness of machinery inspections, the discussion emphasized that any new guidance should remain firmly based on mandatory IMO instruments, avoid introducing new detention criteria or technical standards beyond existing requirements, clearly distinguish mandatory requirements from non-mandatory guidance, avoid overlap with the ISM Code, and recognize that machinery inspections require appropriately qualified personnel.

While there was general support for developing harmonized guidance, opinions were divided on the appropriate format, scope and level of detail. Concerns were expressed that parts of the draft were more suitable as training material than operational guidance, that PSC should not duplicate flag State or recognized organization (RO) survey functions, and that the proposed inspection and testing procedures required further technical review. III 12 referred the draft guidance to the correspondence group for further development, including distinguishing between operational guidance and training material, with a view to finalization at III 13.

Qualifications of PSC officers

A Member State proposed amendments to section 1.9.1 of the Procedures for Port State Control, 2025 (resolution A.1206(34)) concerning the qualifications of port State control officers (PSCOs). The submission argued that the current requirement for a PSCO to be "an experienced officer qualified as a flag State surveyor" effectively links PSC qualifications to the flag State surveyor qualification requirements in paragraphs 28 to 37 of the III.

III 12 considered a proposal to revise the qualification requirements for port State control officers (PSCOs) under the Procedures for Port State Control, 2025. While there was broad support for providing greater flexibility to accommodate different national administrative arrangements, the discussion emphasized the need to maintain robust, harmonized and competency-based qualification standards for PSCOs.

At III 12, views were divided between those supporting greater flexibility through competency-based qualification pathways, and those favouring retention of the existing reference to flag State surveyor qualifications to preserve a harmonized minimum standard. Several alternative formulations were proposed, but no consensus was reached.

Recognizing that the issue has broader implications for the training, qualification and appointment of PSCOs, III 12 agreed that further work was required and tasked the matter to the correspondence group.

Entrant training manual for PSC personnel

III 12 resumed its work on the development of an entrant training manual for port State control officers (PSCOs) following the completion of IMO Model Course 3.09 on Port State Control. The proposed voluntary manual is intended to provide a harmonized framework for the recruitment, training and qualification of new entrant PSCOs, thereby promoting consistent implementation of PSC procedures worldwide.

III 12 considered the draft framework for an entrant training manual for port State control officers (PSCOs) based on a submission. The framework was refined and agreed as the basis for developing the manual. There will be further discussion at III 13 based on the submission therein.

Key discussion points included:

- the manual should be developed specifically for PSCOs, rather than PSC personnel in general;
- references to labour instruments should be limited to the Maritime Labour Convention, 2006 (MLC, 2006);
- the manual should complement, rather than duplicate, the Procedures for Port State Control, 2025;
- the focus should be on types of inspections, rather than types of ships;
- the draft framework was simplified to provide greater flexibility, including streamlining refresher training and training methods.

Harmonized System of Survey and Certification and transfer of flag (HSSC) Guidelines

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

III 12 continued its annual review of the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), with the aim of incorporating amendments to mandatory IMO instruments expected to enter into force by 31 December 2027. III 12 noted the progress made on the draft amendments and agreed that further refinement would be required, including the incorporation of newly effective instruments, with a view to finalizing the revised Guidelines at III 13 before submission to the Maritime Safety Committee (MSC 113), the Marine Environment Protection Committee (MEPC 86) and ultimately the thirty-fifth regular session of the IMO Assembly (A 35) for adoption.

Pilot transfer arrangements

III 12 discussed the extent to which the new mandatory Performance Standards for Pilot Transfer Arrangements (resolution MSC.576(110)) should be reflected in the Survey Guidelines under the HSSC. While a limited update based solely on the SOLAS amendments had been proposed, III 12 supported a more comprehensive approach to ensure that the mandatory Performance Standards are appropriately translated into the guidelines.

Amendments to MSC/Circ.1140 – MEPC/Circ.424 on Transfer of ships between States

Broader Legal Implications of De-registration

III 12 recognized that the proposed revisions to the recommended procedure for the transfer of ships between flag States had raised broader legal issues extending beyond information exchange between Administrations. While there was broad support for referring these issues to the Legal Committee, III 12 also noted the view that de-registration should generally be regarded as a measure of last resort and that the conditions for registration and de-registration remain a sovereign prerogative of the flag State. Recognizing that these issues fall outside the intended scope of the revised procedure, III 12 agreed to invite MSC 112 to refer the broader legal implications of stateless or abandoned ships, including the role of former flag States and the jurisdiction of port States, to the Legal Committee for further consideration.

Draft Revised Procedure for the Transfer of Ships between Flag States

Notwithstanding the broader legal issues, III 12 prepared draft amendments to MSC/Circ.1140–MEPC/Circ.424 with the objective of enhancing information exchange between former and new flag States, particularly where a ship is de-registered for non-compliance before registration under another flag. III 12 discussed the practicality of the proposed notification arrangements, including the dissemination of information through GISIS or circular letters, and concerns regarding the associated administrative burden for Administrations and the Secretariat as well as information receiving

States. III 12 also considered whether provisions relating to the welfare of seafarers under the Maritime Labour Convention, 2006 were appropriate for inclusion in an MSC-MEPC circular. While some drafting proposals were not supported, the draft circular retained the MLC-related provision and was prepared for concurrent approval by MSC 112 and MEPC 85.

Coding system for remote survey eligibility in the Survey Guidelines

III 12 continued its work on developing a standardized coding system to identify survey items that may be eligible for remote surveys under the Survey Guidelines. While supporting further development of a harmonized and transparent methodology, III 12 emphasized that any coding system should remain consistent with the Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications (MSC-MEPC.5/Circ.17), maintain the same level of assurance as physical attendance and should not result in remote surveys becoming the default option. Recognizing that further technical analysis would be required before a coding methodology could be incorporated into the Survey Guidelines, III 12 agreed to continue the work.

list of certificates and documents

III 12 reviewed and updated the draft amendments *to the List of Certificates and Documents Required to be Carried on Board Ships, 2022*, for concurrent approval by MEPC 85, MSC 112, the Legal Committee (LEG 114) and the Facilitation Committee (FAL 51), as appropriate.

Survey guidelines for the Hong Kong Ship Recycling Convention

III 12 initiated the development of survey guidelines for the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (Hong Kong Convention), with a view to incorporating them into the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) and completing the work at III 13.

The correspondence group was instructed to develop a set of survey requirements taking into account resolution MEPC.222(64) on *2012 Guidelines for the Survey and Certification of Ships under the Hong Kong Convention*.

Telecommunication submarine cable resilience

Following a request from MSC 111, III 12 considered whether measures to enhance telecommunication submarine cable resilience, particularly regarding the stowage and securing of anchors, should be incorporated into the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC). III 12 concluded that survey items should be linked to mandatory requirements and, as there are currently no mandatory IMO requirements governing the stowage and securing of shipboard anchors, agreed that the issue should not be addressed through the HSSC Survey Guidelines and to advise MSC 112 accordingly.

Revision of the Interim Explanatory Notes (MSC.1/Circ.1369)

III 12 initiated consideration of consequential amendments to the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) following the approval of the revised Explanatory Notes for safe return to port and orderly evacuation and abandonment after a fire or flooding casualty (MSC.1/Circ.1369/Rev.1), with a view to ensuring harmonized implementation of the relevant SOLAS requirements.

III 12, while in principle agreeing that non-mandatory instrument, in this case, explanatory note, should not be included in the HSSC Guidelines, however, instructed the correspondence group to assess possible impact.

Non-exhaustive list of obligations

The IMO Instruments Implementation Code (III Code), a mandatory instrument forming the basis of the IMO Member State Audit Scheme (IMSAS), requires the identification of obligations under relevant IMO instruments. To support this, a Non-exhaustive List of Obligations is maintained and periodically updated through Assembly resolutions. This list serves as a key reference tool for IMSAS auditors in assessing Member States' implementation and enforcement of IMO instruments, and also supports audited States in conducting preparatory self-assessments. The list is structured according to the roles of flag, coastal and port States, and reflects obligations derived from mandatory instruments in force.

Regular update

III 12 agreed draft amendments to the 2025 Non-exhaustive List of Obligations (NEL) and referred their further development to the correspondence group.

Revision of guidelines on the implementation of the ISM Code

Background

MSC 110 agreed to initiate a comprehensive revision of *the Guidelines on the implementation of the ISM Code by Administrations* (resolution A.1188(33)) and by companies (MSC-MEPC.7/Circ.8), with completion targeted for 2028. The review was to take account of recommendations from the Joint ILO/IMO Tripartite Working Group on Seafarers' Issues and the Human Element (JTWG), relevant studies and previous submissions.

Main discussion points

III 12 generally supported a comprehensive revision of both Guidelines while emphasizing that the review should improve implementation without changing the fundamental principles of the ISM Code. The following principal views were expressed:

- Support for making both Guidelines more practical, concise and user-friendly while maintaining the goal-based and flexible nature of the ISM Code;
- Avoid duplication with the RO Code, III Code and other IMO instruments;
- Define any flexibility for internal audits, remote audits and corrective action timeframes using a properly justified, risk-based approach;
- Recognize Digital Safety Management Systems (DSMS) through a flexible, technology-neutral approach, treating DSMS as a supporting tool rather than a separate management system;
- Ensure that new verification provisions do not interfere with a flag State's right to establish supplementary national requirements;
- Strengthen the role of the Designated Person (DP) without fundamentally changing responsibilities established under the ISM Code;
- Require the DP to maintain direct access to the highest level of management at all times;
- Consider carefully whether a formal Management of Change (MOC) process should be introduced, avoiding unnecessary administrative burdens;
- Retain the existing flexibility for internal audit intervals without introducing additional approval procedures;

- Encourage the sharing of best practices while treating MOC as guidance rather than a mandatory requirement until more widely established within the industry; and
- Avoid introducing guidance that exceeds or is inconsistent with the mandatory provisions of the ISM Code or the III Code.

Conclusion

III 12 did not attempt to resolve the substantive policy issues. Instead, it concluded that significant further work was required and developed a structured roadmap for an intersessional correspondence group. The correspondence group was tasked to undertake a comprehensive review of all relevant background documents, reconcile the various proposals and comments received, and using the roadmap developed by III 12.

Unified interpretation

CO₂ Monitoring in Enclosed Spaces

III 12 considered a proposal to clarify the application of CO₂ monitoring requirements under resolution MSC.581(110), particularly whether CO₂ monitoring, thus carrying CO₂ measurement equipment, should be determined through a risk based assessment rather than applied uniformly. While some delegations supported a clarification to promote consistent implementation, others considered that it would effectively change the intent of the resolution and could weaken safety. As no consensus was reached on the substantive issue, III 12 concluded that it was inappropriate to develop a unified interpretation for a non mandatory instrument and invited interested parties to submit a proposal to MSC for a new output to revise the resolution instead.

Fishing vessel

III 12 reviewed the draft joint FAO/IMO Guidelines for the Seaworthiness and Safety Inspection of Small Fishing Vessels, recognizing their dual objective of improving safety at sea while facilitating access to insurance services, particularly in developing countries. III 12 prepared the draft through non-substantive editorial refinements, including alignment of definitions with existing international instruments, clarification of inspection guidance, and updates reflecting recent regulatory developments, while preserving the voluntary and practical nature of the Guidelines. III 12 agreed to forward the draft Guidelines to MSC 112 for approval, with subsequent publication as a joint FAO/IMO document.

Further information

For further information please contact: imo@liscr.com

Annex

Provisional list of draft resolutions, circulars and other output

- III.3 circular on Lessons Learned from marine casualties
- III.3 circular on the Analysis of Incidents of Ruptured High-pressure Cylinders
- III.3 circular on the quality of investigation reports
- Draft amendments to MSC/Circ.1140–MEPC/Circ.424 on Procedure for the Transfer of Ships between Flag States
- Draft amendments to the List of Certificates and Documents Required to be Carried on Board Ships, 2022
- Revision to the joint FAO/IMO Guidelines for the Seaworthiness and Safety Inspection of Small Fishing Vessels