**ANNEX A**

**ICS REPORT ON THE OUTCOMES OF THE ELEVENTH SESSION OF THE IMO SUBCOMITTEE ON IMPLEMENTATION OF IMO INSTRUMENTS (III 11)**

The eleventh session of the International Maritime Organisation (IMO) subcommittee on Implementation of IMO instruments (III) was held at the IMO Headquarters in London from Monday 21st –Friday 25th July 2025 under the chairman ship of Mr Xie Hui from China. The relevant outcomes of the meeting are summarised below.

**Agenda item 4 - LESSONS LEARNED AND SAFETY ISSUES IDENTIFIED FROM THE ANALYSIS OF MARINE SAFETY INVESTIGATION REPORTS**

The established WG acknowledged the hard work that had led to an increase of the reporting rate of investigations to 73% and recommended that III Sub-Committee encourage Member States to continue timely reporting in the context of the implementation of the Casualty Investigation Code.

The Sub-Committee agreed to bring the Lessons Learned from marine casualties to the attention of the maritime industry with the objectives of conveying such information in accessible and practical formats and facilitate access by seafarers and other maritime industry stakeholders, including training institutions, ship managers, classification societies, and member States – this circular is attached at *Annex B.*

**Agenda item 5 - MEASURES TO HARMONIZE PORT STATE CONTROL (PSC) ACTIVITIES AND PROCEDURES WORLDWIDE**

The main body of work for this Agenda item was to Harmonize Port State Control (PSC) Activities and Procedures Worldwide. This work was sent to the working group and subsequent intersessional correspondence group.

Within the working group, they completed the draft Guidelines for PSC, and added a new appendix on security aspects.

There was also a discussion on PSC guidelines with relation to ISM and Minimum safe manning, however this was not opened due to a lack of majority within the group.

Members will recall ICS cosponsored the submission from Marshall islands et al (III 11/5/3), regarding Flag States interpretations of mandatory provisions. This submission was discussed in tandem with the Chinese et al (III 11/5/4) which supported proposals to eliminate the improper conduct of Flag States.

There was a general discussion regarding the issuing and acceptance of equivalent arrangements and the need to retain flexibility. However, there is also a need to scrutinise documentation that may go above and beyond the scope of any exemption. No consensus on either submission was found.

The ICS submission on the 2024 CIC on MLC and Crew wages was discussed within the plenary, with a number of delegations supporting the initiative outlining the difficulties Port State Control face whilst inspecting vessels with regards to the MLC.

The submission was not forwarded to the working group as there was not a majority in support of the recommendation for additional training, however the Chair noted that this is clearly an important and wide ranging subject that may need to be discussed in the future.

**Agenda item 8 - UPDATED SURVEY GUIDELINES UNDER THE HARMONIZED SYSTEM OF SURVEY AND CERTIFICATION (HSSC)**

Draft amendments to the 2023 HSSC Guidelines (A.1186(33)) were finalized, reflecting mandatory requirements entering into force by 31 December 2025. Work also included reviewing items pending future inclusion and starting preparations for updates extending to 2027.

Key outcomes of III 11 related to HSSC Survey Guidelines are:

* Paragraph 12 of LEG 112/6/2 to amend MSC/Circ.1140 – MEPC/Circ.424: *Further work on fraudulent ship registration* referred to III 11 CG.
* Three-date criterion in MEPC.392(82): III 11 concluded that no explicit addition needed in the HSSC Guidelines (consistent with current practice).
* Gap analysis (Annex 4 & 5 of HSSC Survey Guidelines): One gap found (IGC Code, Chapter 4) & proposed amendments finalised for submission to A 34.
* BWMS calibration check: In-depth review postponed until adoption of the mandatory amendments to BWMC & BWMS Code (MEPC.300(72)).
* Elements pertaining to IP Code: Agreed for incorporation in the consolidated HSSC Guidelines with a view to submitting to A 34.
* Survey items pertaining to AFS Convention: Deleted due to absence of harmonized survey provisions in the AFS Convention.
* Draft amendments to HSSC 2023 (resolution. A.1186(33)): Finalised with editorial refinements and submitted for A 34 adoption.

**Agenda item 10 – REMOTE SURVEYS, ISM AND ISPS AUDITS.**

Following operational challenges during the COVID-19 pandemic, the use of remote surveys, audits, and verifications gained global attention as a viable means to maintain compliance. III has approached this topic in three phases.

Phase 1 covered amendments to Survey Guidelines under the HSSC and amendments to the revised Guidelines on the implementation of the ISM Code

Phase 2 (concluded at III 11) focused on developing guidance on the assessment and applications of remote surveys, ISM Code Audits and ISPS Code Verifications. The resulting guidance is structured as follows:

* Part A: Common Guidance of a general nature that overarches the use of remote technology for activities related to statutory certification under the relevant IMO mandatory instrument
* Part B-I: Guidance specific to remote surveys of ships under HSSC Guidelines
* Part B-II: Guidance specific to remote verifications for ships and companies under the ISM Code

Phase 3 will focus on further developments to the HSSC Guidelines and Amendments to the revised Guidelines on implementation of the ISM Code

III 11 agreed to the following:

-ISPS remote verifications: The use of remote verifications in place of in-person attendance has been limited to extraordinary cases (interim, intermediate, additional shipboard verifications)

-ISM interim audits: III 11 confirmed that interim audits should not be entirely replaced by remote audits as previously endorsed by III 10.

-Remote survey eligibility coding: Preferred approach is to add a new column in the HSSC Guidelines and this work is tasked to the III 11 CG.

-Draft MSC-MEPC circular (Annex 6 of III 11/WP.5): On guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications has been agreed at III 11 and will remain under review, based on the experience gained in conducting remote surveys, audits and verifications (paragraphs 34 to 37 of III 11/W.P 5).

**Agenda item 15 – ANY OTHER BUSINESS**

Within AOB, there were two items discussed which both related to Flag state relations with Recognised Organisations (ROs).

The first was the submission from China regarding the UI of ‘completion date of survey’, which was discussed at length and IACS provided some clarity.

The second was regarding provisions being left ‘to the satisfaction of the administration’. There was a general consensus that some guidelines may be needed on this issue.