

III 10 summary

The 10th session of the Subcommittee on Implementation of IMO Instruments (III 10) was held at the IMO headquarters from 22 to 26 July 2024. The meeting took place in hybrid-mode with facilities for registered delegates dialling-in remotely.

The following brief provides a summary of topics relevant to OCIMF and its members that were discussed or agreed during III 10.

Overview of discussions

Marine safety investigation and reporting

- Analysis of marine casualty investigation reports submitted to the IMO.
- Other observations related to casualty investigation.

Port State Control (PSC)

- Transparency and harmonisation of PSC information.
- Development of draft PSC guidelines to improve maritime security.

Remote survey guidance and audits

- Development of guidance on remotely conducted surveys, International Safety Management (ISM) Code audits and International Ship and Port Facility Security (ISPS) Code verification.

Marine safety investigation and reporting

Marine casualty investigation reports analysis

A selection of casualty investigation reports submitted by Flag Administrations to the IMO is cyclically assessed by a dedicated intersessional correspondence group (CG) to draw out lessons learned. A working group established during III 10 built on the work undertaken by the CG. Their observations included the following:

- Collisions with fishing vessels: Of the fishing vessels involved in collisions with commercial ships, less than 20% carried a working Automatic Identification System (AIS) or VHF radio equipment at the time. This was far lower than what the domestic legislation for fishing vessels in countries globally required. Noting that fishing vessels were “non-SOLAS” ships, a revised circular was drafted recommending national Administrations to expand AIS and VHS carrying requirements more widely to fishing vessels with a view to approval from the Maritime Safety Committee (MSC).
- General: Common factors leading to a casualty included a lack of safety management and safety culture where risk assessments, safety reviews and supervision were ignored.
- Reporting rate: There has been an uptick in the investigation reports submissions rate by flag Administrations from 61.5% to 73.6% in the past three years – a sign of positive engagement.

Other observations relating to casualty investigation

- III 10 noted the publishing of III.3/Circ.11 on the development of lessons learned by marine safety investigating states. This circular seeks to standardise casualty investigation and recommends to the investigation flag Administration to undertake a lessons learned exercise as part of their investigation process.
- A general view that the quality of casualty investigation reports in some instances required improvement.
- Accidents related to enclosed spaces, falls from height, and those involving survival and rescue craft continue to take place unabated.
- A growing appetite for a comprehensive review of the IMO Casualty Investigation Code.
- An appreciation that the IMO was presently undertaking a study on the effectiveness of the ISM Code, where discussions around casualty investigation were likely to feature.

Port State Control (PSC)

Transparency and harmonisation of PSC information

Electronic Quality Shipping Information System (Equasis)

The Equasis works as a freely available online resource which displays ship safety-related information provided by public authorities such as the regional Port State Memorandum of Understanding as well as established industry organisations. The III subcommittee noted a growing interest in the data provided by Equasis and its importance in driving safety in the maritime industry.

Of greater interest to OCIMF membership would be the work undertaken by the Greece-based organisation DYNAMARINE, which is working together with Equasis to provide new data regarding ship-to-ship transfer operations. This is expected to be made available by the end of 2024.

Report of the working group on measures to harmonise PSC activities worldwide

Some of the relevant discussions undertaken by this group which met during the III 10 include the following:

- Daily hours of rest for seafarers and grounds for ship detention: A debate on whether missing rest hour records for seafarers was sufficient grounds for detention proved inconclusive, and is likely to be brought to the attention of the Human Element, Training and Watchkeeping (HTW) subcommittee at the next opportunity.
- Proposed amendments to Procedures for Port State Control, 2023: In the section on guidelines for the detention of ships particular emphasis on detainable deficiencies under the ISM and the STCW Codes were noted.

PSC guidelines on maritime security

III 10 agreed for an intersessional correspondence group to work on developing draft PSC guidelines on control and compliance measures to enhance maritime security with a view to finalising by III 11 in 2025. These guidelines seek to inform stakeholders such as a PSC inspector whether the security equipment and systems on board a ship followed the requirements of SOLAS chapter XI-2 of the ISPS Code.

Guidance on remote surveys, ISM Code audits and ISPS Code verifications

These guidelines are being developed by the IMO with a view to assisting flag Administrations by defining the scope of and standardising the conduct of remote surveys under the Harmonised System of Survey and Certification (HSSC), ISM audits and ISPS verification. In doing so, it also aims to achieve an equivalent level of compliance with in-person verification, where appropriate. Not all survey/audit/verification activity under the respective regulatory regime will be eligible to be undertaken remotely with eligible items to be categorised accordingly in the guidelines.

The guidelines are expected to be finalised by III 11 in 2025, and published subject to approval by the MSC and Marine Environmental Protection Committee (MEPC).