



IMO News Brief

The 12th session of the Sub-Committee on
Implementation of IMO Instruments
Korean Register



Executive Summary

The 12th session of the Sub-Committee on Implementation of IMO Instruments (III) was held from 20 to 24 July 2026 at IMO Headquarters in London, United Kingdom. The session addressed a wide range of matters, including the harmonized implementation of Port State Control (PSC) activities and procedures, the development of an entrant training manual for PSC officers, and the review of the Casualty Investigation Code (CI Code) and the associated implementation guidelines.

The Sub-Committee on Implementation of IMO Instruments supports the work of the Maritime Safety Committee (MSC) and the Marine Environment Protection Committee (MEPC). Its role is to promote a globally consistent level of compliance with IMO conventions and to ensure the effective implementation of IMO instruments and related regulations, thereby contributing to maritime safety and the protection of the marine environment.

The main discussions and decisions of this session are summarized below:

- **Consideration of draft amendments to the 2025 Procedures for Port State Control (resolution A.1206(34))**
 - Development of guidance for PSCOs on the inspection of ships' machinery and maintenance
 - Review of PSCO qualification requirements
- **Consideration of draft amendments to the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2025 (resolution A.1207(34))**
 - Incorporation of the latest amendments to IMO instruments and provisions related to pilot transfer arrangements
 - Introduction of a coding system for remote surveys
- **Finalization of draft amendments to MSC/Circ.1140 and MEPC/Circ.424 on the transfer of ships between States***
 - * Introducing a notification mechanism for ships deregistered without securing a new flag State.

Finally, we sincerely hope that this Brief will help a wide range of readers better understand the key outcomes of III 12 and support the timely and effective implementation of appropriate follow-up actions.

Review of the CI Code and the associated implementation Guidelines

Summary

Outcome	The Sub-Committee agreed to review the CI Code and the associated implementation guidelines with a view to improving the quality and timeliness of marine casualty investigation reports, and to further develop draft amendments through a Correspondence Group.
Concerned Parties	☐ Ship Owners ☐ Shipyards ☐ Equip. Makers ☒ Others (Administrations)
Application Date	TBD (Revision of the CI Code and the associated implementation guidelines is targeted for completion in 2028.)
Implication	☐ Designs ☒ Operation ☐ Negligible
Source	III 12/WP.3/Annex 6, 7

Background

Following the decision of the Maritime Safety Committee at its 110th session (MSC 110, June 2025), the Sub-Committee on Implementation of IMO Instruments commenced work on the revision of the Code of the International Standards and Recommended Practices for a Safety Investigation into a Marine Casualty or Marine Incident (Casualty Investigation Code, or CI Code) and the Guidelines to assist investigators in the implementation of the Casualty Investigation Code (resolution A.1075(28)), with a target completion year of 2028.

Key Outcomes

The Sub-Committee considered the need to review the relevant provisions, definitions and recommended practices of the CI Code and the associated implementation guidelines in order to improve the quality and timeliness of marine casualty investigation reports. The discussion also addressed the possible conversion of

certain recommended practices into mandatory provisions, alignment between the Code and the Guidelines, and the need to reflect practical experience gained by marine safety investigation authorities. Due to time constraints, the Sub-Committee agreed that detailed consideration of the draft amendments should continue through a Correspondence Group.

- Key issues considered in relation to the revision of the CI Code and the associated implementation guidelines included investigation principles, the independence of investigation authorities, time frames for the submission and updating of reports, application to non-SOLAS ships, casualty definitions, and limitations on the use of investigation evidence.
- The Sub-Committee also discussed possible measures to make information available in a timely manner in cases of delayed reporting of very serious marine casualties, including the use of preliminary reports or interim statements, as well as notification and cooperation procedures among substantially interested States and the possible introduction of a standard notification format.

Implications

As discussions on the revision of the CI Code and the associated implementation guidelines will continue, Administrations and marine safety investigation authorities should closely monitor future developments.

Measures to Harmonize Port State Control (PSC) Activities and Procedures Worldwide

Summary

Outcome	The Correspondence Group is invited to further consider the qualification requirements for PSCOs and the development of guidance for PSCOs on the inspection of ships' machinery and maintenance, and to report to III 13.
Concerned Parties	☒ Ship Owners ☐ Shipyards ☐ Equipment Makers ☒ Others (Administrations)

Application Date	The draft amendments are expected to be finalized at III 13 and adopted by A 35, tentatively in December 2027.
Implication	☐ Designs ☒ Operation ☐ Negligible
Source	III 12/WP.

Background

To promote the harmonized implementation of Port State Control (PSC) activities and procedures worldwide, the following matters were considered:

- in view of the increasing recognition that machinery failures and inadequate maintenance have become major contributing factors to marine casualties and PSC detentions, the development of consistent and technically robust guidance for PSCOs on the inspection of ships' machinery and maintenance was proposed, together with its possible incorporation as a new appendix to the *Procedures for Port State Control, 2025* (resolution A.1206(34)) (hereinafter referred to as "the Procedures"); and
 - in recognition of the practical difficulties faced by Administrations with limited resources, amendments to the Procedures were proposed to relax the qualification requirements for Port State Control Officers (PSCOs).*
- * Under the current Procedures, a PSCO is required to be qualified and experienced as a flag State control officer (FSCO). The Marshall Islands suggested deleting this requirement.

Key Outcomes

- (Guidance for PSCOs on the inspection of ships' machinery and maintenance) The proposal received broad support from several Member States, including the Republic of Korea, Greece, Ireland, France and Italy. However, some Member States expressed the view that, given its detailed technical content and specific inspection guidance, the proposed guidance may be more appropriately developed as part of the PSCO Training Manual rather than incorporated into the *Procedures for Port State Control*.

Accordingly, III 12 agreed to establish a Correspondence Group to further consider the following matters:

- further review and develop the draft guidance, taking into account the discussions at III 12; and

- consider the possible inclusion of the draft guidance as a new appendix to the *Procedures for Port State Control*, with a view to finalization at III 13.

- (PSCO qualification requirements) Recognizing both the importance of this agenda item and the practical difficulties raised by some Administrations in meeting the existing qualification requirements, III 12 established a Working Group to consider the matter in detail.

Within the Working Group, the proposal received strong support, particularly from flags of convenience (FoC) and Administrations with limited resources. However, the Republic of Korea, supported by the United Kingdom, Japan, Italy and the Paris MoU, emphasized the continued validity and effectiveness of the existing provisions.

In particular, these delegations stressed that the qualifications and competence of PSCOs are essential to credibility, effectiveness and harmonized implementation of port State control, and cautioned against reaching a premature conclusion. Following discussions, Member States put forward several alternative proposals aimed at ensuring an appropriate minimum level of qualifications while providing flexibility in qualification and training pathways.

III 12 recognized that the issue was not whether PSCO competence should be ensured, as there was no disagreement on the need for competent PSCOs, but rather what minimum qualification requirements and training pathways would be appropriate. Accordingly, III 12 agreed that the matter should be further considered by the Correspondence Group on a broader basis, without limiting the discussion solely to paragraph 1.9.1 of the *Procedures for Port State Control*.

Implications

- (Guidance for PSCOs on the inspection of ships' machinery and maintenance) The draft guidance for PSCOs on the inspection of ships' machinery and maintenance is expected to be further refined before possible inclusion as a new appendix to the *Procedures for Port State Control*.

As the guidance reflects concerns that machinery failures and inadequate maintenance are among the principal causes of marine casualties and PSC

detentions, more focused PSC inspections of machinery condition and maintenance arrangements may be expected in the future.

Shipowners and other relevant stakeholders should therefore closely monitor future developments. In particular, as the draft guidance includes elements relating to machinery and equipment maintenance, effective implementation of the *International Safety Management (ISM) Code* and proper maintenance management will remain important for PSC readiness.

- (PSCO qualification requirements) Any revision to the qualification requirements and training pathways for PSCOs may require port State control authorities to review and, where necessary, update their domestic frameworks for minimum qualifications, training, practical experience, assessment and authorization of PSCOs

Development of an Entrant Training Manual for PSCOs

Summary

Outcome	The draft manual, initially proposed at III 8 (III 8/6) and revised at this session to reflect comments from Member States, is to be further developed by China, circulated to regional PSC MoUs for comments, and submitted to III 13 for final consideration.
Concerned Parties	☒ Ship Owners ☐ Shipyards ☐ Equip. Makers ☒ Others (Administrations)
Application Date	The draft manual is expected to be finalized at III 13 and adopted by A 35, tentatively in December 2027.
Implication	☐ Designs ☐ Operation ☒ Negligible
Source	III 12/WP.4

Background

Discussions were held on the development of an entrant training framework for Port State Control Officers (PSCOs), with a view to enhancing the consistency and harmonized implementation of PSC activities worldwide.

III 12 recalled the decision taken at III 8 to revisit this item following the revision of IMO Model Course 3.09 and, based on proposals by Ireland and the Caribbean MoU, established a Working Group to consider the matter in detail.

Key Outcomes

China reiterated the need to develop a common training manual in order to establish a globally consistent entrant training system for PSCOs.

During the Working Group's deliberations, some Member States proposed including the Maritime Labour Convention, 2006 (MLC, 2006), in the training framework, and this was agreed. The Working Group also deleted duplicative content from the existing draft and revised and supplemented parts of its structure and content.

III 12 agreed that China would further develop the draft manual, taking into account the outcome of the Working Group's discussions, circulate it to all regional PSC MoUs for review and comments, and submit the final draft to III 13.

Implications

If the entrant training manual for PSCOs is finalized and approved, port State control authorities are expected to be able to apply common entry-level training standards for the basic training, on-board or field training, and assessment of new PSCOs.

Relevant industry stakeholders should monitor the future development and approval of the manual. Shipowners should also continue to review their PSC readiness and compliance with applicable international conventions, taking into account the possibility that PSCO training levels and inspection approaches may become more standardized.

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

Summary

Outcome	Amendments entering into force by the end of 2027 were incorporated into the Survey Guidelines under the HSSC, and the draft amendments to the list of certificates and documents required to be carried on board ships and to MSC/Circ.1140–MEPC/Circ.424 on the transfer of ships between States were finalized.
Concerned Parties	☒ Ship Owners ☒ Shipyards ☒ Equip. Makers ☒ Others (Administrations)
Application Date	Expected adoption by A 35 (December 2027), following finalization of the draft amendments at III 13
Implication	☐ Designs ☒ Operation ☐ Negligible
Source	III 12/WP.5/Annexes 1, 2, 4 and 5; III 12/10, annexes 4 and 5

Background

The matter concerns the update of the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) (resolution A.1207(34)) to align them with the latest amendments to IMO instruments and to manage items requiring future amendment in a systematic manner. The Sub-Committee considered draft amendments reflecting requirements entering into force up to the end of 2027, as well as amendments related to pilot transfer arrangements expected to enter into force in 2028. The discussions also covered the introduction of a coding system for remote survey, procedures for the transfer of ships between States, the list of certificates and documents required to be carried on board ships.

Key Outcomes

- (Update of the HSSC Survey Guidelines) The main updates to the HSSC Survey Guidelines, reflecting amendments to IMO instruments entering into force by the end of 2027, are as follows:
 - Survey items were updated to include matters related to lifting appliances and anchor-handling winches, restrictions on PFOS-containing fire-extinguishing media, electronic inclinometers, and rational emission control strategies under the NOx Technical Code.
- (Survey items related to pilot transfer arrangements) With respect to pilot transfer arrangements, III 12 reviewed detailed survey items based on Option

2* and finalized the related draft amendments under SOLAS regulation V/23 and resolution MSC.576(110).

*Option 2: The survey items cover, among others, deck securing points, pilot ladders and manropes, means of securing ladders, combination and trapdoor arrangements, deck access arrangements, associated equipment and lighting, certification validity, maintenance plans and records, shipboard familiarization records and means of communication for the responsible officer.

- (Coding system for remote surveys) III 12 considered the introduction of a new column and an item-level coding system in the HSSC Survey Guidelines to indicate whether remote surveys may be applied. However, due to the complexity of the work and time constraints, the coding system was not finalized. The matter will be further developed intersessionally by the Correspondence Group and is expected to be finalized at III 13 in July 2027.
 - Although initial and renewal surveys are not subject to remote survey, explanatory text will be included in the HSSC Survey Guidelines to clarify that plan approvals and document reviews forming part of such surveys may be coded “Y”, as they may be carried out remotely.
 - The explanatory text for the “Y”, “N” and “C” codes, as well as the location where such text should be inserted in the Guidelines, will be further developed by the Correspondence Group.
 - The coding system will be further refined in the future, taking into account practical experience and any implementation issues identified, while the coding methodology set out in annex 5 will be used as reference material.

- (Procedures for the transfer of ships between States) III 12 reviewed draft amendments to MSC/Circ.1140–MEPC/Circ.424 on the transfer of ships between States in order to address potential gaps where a ship is deregistered by its former flag State due to non-compliance with convention requirements without securing a new flag State.

The draft amendments introduce a mechanism for the former flag State to notify IMO of ship identification details, the date of deregistration and a summary of the non-compliances when a ship is deregistered without securing a new registration. This mechanism is intended to improve information sharing through IMO and to raise awareness among Member States of ships that may temporarily operate without nationality.

The draft amendments are expected to be submitted to MSC 112 and MEPC 85 for approval. Related legal issues concerning stateless or abandoned ships, including risks to safety, environmental protection and seafarer welfare, the responsibilities of former flag States and port State jurisdiction, were referred to the Legal Committee for further consideration.

- (Revision of the list of certificates and documents required to be carried on board ships) III 12 agreed to add the Guidance on the carriage and use of Electronic Nautical Publications (ENP) systems (MSC.1/Circ.1705) under “charts and nautical publications”, and the MASS Safety Certificate under “other certificates and documents which are not mandatory”. The relevant circular is expected to be submitted concurrently to MEPC 85, MSC 112, LEG 114 and FAL 51 for approval.

Implications

The revision of the HSSC Survey Guidelines may directly affect ship survey checklists, the scope of surveys and the determination of eligibility for remote surveys. In particular, as survey items related to pilot transfer arrangements under SOLAS regulation V/23 and resolution MSC.576(110) are expected to include certification validity, maintenance plans and records, crew familiarization records and means of communication for the responsible officer, shipowners, shipyards and equipment manufacturers should review the relevant requirements and prepare accordingly.

Non-exhaustive List of Obligations under the III Code

Summary

Outcome	Amendments to mandatory IMO instruments entering into force by 1 July 2028 were incorporated into the Non-exhaustive List of Obligations (NEL).
Concerned Parties	☒ Ship Owners ☐ Shipyards ☐ Equip. Makers ☒ Others (Administrations)

Application Date	Expected adoption by A 35 (December 2027), following finalization of the draft amendments at III 13
Implication	☐ Design ☒ Operation ☐ Minor
Source	III 12/WP.5, annexes 6, 7 and 8

Background

The Non-exhaustive List of Obligations (NEL) compiles Member State obligations under mandatory IMO instruments relevant to the III Code and is used as reference material in IMSAS audits when reviewing the implementation of convention obligations by flag, coastal and port States. This work is intended to incorporate the latest amendments to mandatory IMO instruments into the 2025 Non-exhaustive List of Obligations (resolution A.1208(34)) and to address elements of the existing list requiring further structural and substantive review.

Key Outcomes

Based on annex 6 to document III 12/10, III 12 reviewed the draft amendments to the 2025 Non-exhaustive List of Obligations and agreed to incorporate the principal obligations arising from amendments concerning lifting appliances and pilot transfer arrangements under SOLAS, the Polar Code, the IGC Code and the NOx Technical Code.

- The draft amendments will continue to be developed together with amendments to mandatory instruments entering into force by 1 July 2028, for submission to III 13 and subsequent adoption by A 35.
- The comprehensive review, including flag State obligations, which could not be completed owing to time constraints, will be finalized by the Correspondence Group for III 13, taking into account annex 8 and comments from Member States. Simple data management approaches, such as spreadsheets, will also be used to facilitate efficient maintenance of the list.

Implications

The revision of the Non-exhaustive List of Obligations may affect Member States' preparations for IMSAS audits, the classification of flag, coastal and port State

obligations, and the framework for managing the delegation of authority to recognized organizations (ROs).

Comprehensive Revision of the Guidelines for the Implementation of the ISM Code

Summary

Outcome	Establishment of a Correspondence Group and development of road map for the comprehensive revision of the ISM Code implementation guidelines
Concerned Parties	☒ Ship Owners ☐ Shipyards ☐ Equip. Makers ☒ Others (Administrations)
Application Date	TBD (The draft revised guidelines are expected to be finalized following discussions at III 13 and III 14.)
Implication	☐ Designs ☒ Operation ☐ Negligible
Source	III 12/WP.5/Annex 9

Background

MSC 110 agreed to undertake a comprehensive revision of the guidelines for Administrations and companies on the implementation of the ISM Code. This work is intended to comprehensively reflect the recommendations of the Joint ILO/IMO Tripartite Working Group on seafarers' issues and the human element, the IMO Secretariat's study on the effectiveness and effective implementation of the ISM Code, and proposals contained in previous MSC and III documents. The instruments subject to review are resolution A.1188(33) and MSC-MEPC.7/Circ.8. The focus is not on amending the ISM Code itself, but on supporting more consistent implementation of the ISM Code by Administrations and companies.

Key Outcomes

Pursuant to the instructions of MSC 110, III 12 considered the need for a comprehensive revision of the guidelines for Administrations and companies on the implementation of the ISM Code. The review covered the relevant parts of

documents MSC 107/17/5, MSC 108/16/1, MSC 109/19/7, MSC 109/INF.3, III 9/4, III 12/12, III 12/12/1, III 12/12/2 and III 12/12/3, and concluded that the proposals and comments contained in these documents should be comprehensively reviewed and coordinated.

Accordingly, III 12 recommended the establishment of an correspondence group to identify and coordinate the issues and proposals in the relevant documents and to develop draft amendments to resolution A.1188(33) and MSC-MEPC.7/Circ.8, using the roadmap set out in annex 9 to document III 12/WP.5 as a starting point. The roadmap is structured to first establish the principles and objectives of the revision, and then to consider matters such as changes in company organizational structures, the role of the designated person ashore (DPA), the effectiveness of safety management systems, risk management and risk assessment, corrective action plans, internal audit intervals, digital safety management systems, and data-driven approaches to improvement. The correspondence group is expected to submit its report and further matters for consideration to III 13, with a view to finalizing the draft revised guidelines at III 14.

Implications

If the ISM Code implementation guidelines are revised in the future, they may have a substantive impact on the criteria applied by Administrations and recognized organizations (ROs) for company and ship audits, as well as on the way shipping companies operate their safety management systems (SMS). In particular, more detailed guidance may be developed on virtual and distributed company structures, digital SMS, risk assessment, and the effectiveness of corrective actions. Shipping companies and ROs should therefore review in advance their existing internal audit arrangements, the role of the designated person ashore (DPA), risk management procedures, and systems for managing non-conformities and corrective actions.

Unified Interpretations of Provisions of IMO Conventions

Summary

Outcome	Consideration of unified interpretations of provisions of IMO safety, security and environmental conventions, including the proposal concerning resolution MSC.581(110)
Concerned Parties	☒ Ship Owners ☐ Shipyards ☐ Equip. Makers ☒ Others (Administrations)
Application Date	Not applicable, as the proposal was not pursued as a unified interpretation of non-mandatory guidance
Implication	☐ Designs ☐ Operation ☒ Negligible
Source	III 12/13

Background

This agenda item concerns unified interpretations of provisions of IMO conventions relating to safety, security and the environment. At III 12, INTERTANKO proposed developing a unified interpretation concerning carbon dioxide (CO₂) monitoring before entry into enclosed spaces, as provided in resolution MSC.581(110), with a view to clarifying the scope of application according to ship-type-specific risk characteristics.

Key Outcomes

It was noted that unified interpretations are intended to prevent divergent interpretations of mandatory convention provisions by States and organizations and to ensure their consistent application; therefore, applying that procedure to non-mandatory guidance would not be procedurally appropriate.

Following discussion, III 12 rejected the proposal on the grounds that it did not fall within the scope of the procedure for developing unified interpretations. However, it recommended that, if amendment or further clarification of the guidance is considered necessary, a new output proposing amendments to the resolution should be submitted to the parent body, the Maritime Safety Committee (MSC).

Implications

The significance of the discussion lies in clarifying the scope of application of the unified interpretation procedure. Where interpretative issues arise in relation to non-mandatory guidance, future action may instead take the form of amendments

to the guidance, a clarifying document, or further consideration by the relevant committee.

Guidelines for Seaworthiness and Safety Inspections of Small Fishing Vessels

Summary

Outcome	Finalization of the guidelines for seaworthiness and safety inspections of small fishing vessels and the associated checklist, with a focus on improving clarity
Concerned Parties	☒ Ship Owners ☐ Shipyards ☐ Equip. Makers ☒ Others (Administrations)
Application Date	Expected to be issued as a joint FAO/IMO publication following approval by MSC 112
Implication	☐ Designs ☐ Operation ☒ Negligible
Source	III 12/WP.8

Background

Small fishing vessels constitute a sector with limited access to insurance and relatively weak safety-management frameworks. Following an international expert review, the Food and Agriculture Organization of the United Nations (FAO) developed draft guidelines for seaworthiness and safety inspections. The expert group reviewed the draft and prepared practical inspection guidance and a checklist.

Key Outcomes

The guidelines are voluntary and intended for assessing the condition of the hull, stability, safety equipment, navigation and communication equipment, and machinery and electrical installations of small fishing vessels other than fishing vessels of 24 metres in length and over that fall within the scope of the Cape Town Agreement.

- The guidelines apply to decked fishing vessels of less than 12 metres in length and undecked fishing vessels of any size, and are intended to support access to insurance services and improvements in safety-management standards.
- The expert group clarified the definitions of fishing vessel and vessel inspector and supplemented the provisions concerning damage to wooden vessels, FRP-sheathed wooden vessels, emergency procedures, personal flotation devices and communication equipment.

Implications

As the guidelines are voluntary, their direct impact on industry is expected to be limited. They may nevertheless serve as useful reference material for Member States in establishing inspection regimes for small fishing vessels and improving safety-management standards.

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