

I. The Sub-Committee on Implementation of IMO Instruments, 11th Session (III 11)

The Sub-Committee on Implementation of IMO Instruments (III) mainly works on gathering the flag, port, and coastal States to consider implementation issues, including the analysis of consolidated audit summary reports from the mandatory IMO Member state Audit Scheme. It plays a key role in casualty analysis and issuing lessons learned from marine incidents. The Sub-Committee receives and analyses port State control data and keeps under review the procedures for port State control. Guidelines for survey and certification, including the survey guidelines under the Harmonized System of Survey and Certification (HSSC), also come under the remit of this Sub-Committee.

The 11th session of the III Sub-Committee was held from July 21st to 25th, 2025, at the IMO Headquarters in London. Key outcomes for III 11 are as follows:

1. Related to the *Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications*

III 11 had agreed to the draft text of the Guidance on assessments and applications of remote surveys, ISM Code audits, and ISPS Code verifications ([Note 1](#)), and the associated MSC-MEPC circular, for submission to the Maritime Safety Committee (MSC) and the Marine Environment Protection Committee (MEPC) for approval.

(1) Remote surveys

Some of the survey items may be carried out remotely, based on a risk assessment and the eligibility of the item for using remote methods. However, the same survey items cannot be performed in remote surveys for two consecutive years. In all cases, the survey plan needs to be approved by the flag administration.

Remote surveys are not accepted for SOLAS safety certificates and the International Load Lines (LL) Certificate for passenger ships.

(2) International Safety Management (ISM) Code audits

ISM Code shipboard audits cannot be fully replaced by remote audits, and under normal circumstances, the survey will always be needed with physical attendance, including the initial, renewal, and interim company audits.

Remote methods may be considered for annual audits and for interim audits when adding a new ship type to an existing Document of Compliance (DOC). However, the performance of remote audits will need approval from the flag administration, and the audit plan needs to be sent well in advance to the flag administration for review and

approval.

(3) International Ship and Port Facility Security (ISPS) Code verifications

The ISPS Code verifications can only be carried out remotely under exceptional circumstances, and only selected items are eligible for remote verification even in exceptional circumstances.

2. Measures to harmonize Port State Control (PSC) (Note 2) activities and procedures worldwide

(1) Draft amendments to the *Procedures for Port State Control* and revision of relevant instruments

III 11 had finalized draft amendments to the “*Procedures for Port State Control 2023*” (resolution A.1185(33)), and approved the draft guidelines for Port State Control Officers (PSCO) on security aspects. The draft Assembly resolution on *Procedures for Port State Control, 2025*, will be submitted for adoption at the 34th session of the IMO Assembly (A 34), which may update and replace the 2023 Procedures once it enters into force.

The new version included amendments to appendices 2, 8, 9, 11, and 18 of the *Procedures for PSC, 2023*, and added a new appendix 20 (*Guidelines for Port State Control Officers (PSCO) on security aspects*) to help PSCOs identify potential security concerns and escalate appropriately. The new guidance helps to clarify the responsibilities between PSCOs and Duly Authorized Officers (DAOs) to identify potential security concerns and escalate appropriately. The list of instruments relevant to PSC procedures was revised and added as Appendix 21.

The new draft amendments include updates to the list of “detainable deficiencies” (in Appendix 2) related to implementation of the ISM Code (Appendix 8), Long-Range Identification and Tracking (LRIT) (Appendix 9), certification of seafarers, ship manning, and hours of rest (Appendix 11). Under MARPOL Annex VI (Appendix 18), a new chapter will be added related to the non-availability of compliant fuel oil.

(2) Specific matter of inspecting the escape arrangement

For the general issue of differing interpretations of mandatory provisions between flag States and port States, regarding the specific matter of inspecting escape arrangements from machinery spaces. At MSC 110 (June 2025), the Committee had encouraged PSC authorities to adopt a pragmatic approach, as outlined in MSC.1/Circ.1689 (*Escape Arrangements from the Lower Part of Machinery Spaces*), while continuing to consider further clarifications to the relevant technical regulations.

III 11 had also reminded flag States and Recognized Organizations (ROs) of their obligation to issue certificates in accordance with paragraph 1.2.6 of the PSC procedures, and emphasized to port States the importance of adhering to paragraph 1.2.5 when conducting PSC inspections.

Regarding the inconsistent application of ISM Code-related deficiencies across PSC regimes, and the development of objective criteria to assess manning levels. No changes were made to the PSC procedures. III encourages regional PSC regimes to conduct internal reviews and training to improve consistency. It also emphasizes that flag States are responsible for determining minimum safe manning, instead of the PSCOs. III 11 also updated the draft revised Model Course 3.09 on Port State Control.

3. Finalized the draft amendments to the Survey Guidelines under Harmonized System of Survey and Certification (HSSC), 2023 (resolution A.1186(33))

III 11 had finalized the draft amendments to the *2023 Survey Guidelines under Harmonized System of Survey and Certification (HSSC)* (resolution A.1186(33)) ([Note 3](#)), and the *2023 Non-Exhaustive List of Obligations under Instruments Relevant to the IMO Instruments Implementation (III) Code* (resolution A.1187(33)) ([Note 4](#)). Both documents above are expected to be adopted at Assembly 34 (A 34) in December 2025 and enter into force on January 1st 2026.

The new HSSC Guidelines will include provisions for the Code of Safety for Ships Carrying Industrial Personnel (IP Code). Provisions related to the Anti-fouling System (AFS) Certificate were removed from the Guidelines, since the AFS Convention 2001 does not provide a harmonized survey and certification system

III 11 had also re-established the Correspondence Group for the survey guidelines under the HSSC and the non-exhaustive list of obligations. The Group will be considering matters related to unlawful practices associated with fraudulent registration and fraudulent registries of ships, reviewing MSC/Circ. 1140 and MEPC/Circ. 424 on *Transfer of Ships between States*, and consider whether the circulars need to be amended with measures to prevent such practices.

4. Revised the “completion date of the survey” (MSC-MEPC.5/Circ.3) for the Unified interpretations (UI)

III 11 had discussed the amendments to a revision of the *Unified interpretation of the date of completion of the survey and verification on which the certificates are based* (MSC-MEPC.5/Circ. 3), which related to UIs of the date of completion of the survey and verification

on which the certificates are based. The revised UI clarifies that the “based on date” shall be the date of the last initial or renewal survey. And the amended MSC-MEPC circular will be submitted to MSC 111 (May 2026) and MEPC 84 (in 2026) for approval.

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- Note 1: The guidance mainly addresses the need to harmonize requirements for the use of remote methods in surveys, audits and verifications. Aiming to ensure that the confidence and credibility of current remote methods are maintained at a level equivalent to in-person attendance, thereby supporting the safe operation of ships and contributing to maritime safety and the prevention of marine pollution.
- Note 2: Port State Control (PSC) refers to the inspection of foreign ships in national ports to verify their compliance with international maritime regulations. PSC serves as a second line of defense against to substandard shipping (in addition, the first line of defense is implementation and enforcement of IMO rules by the flag State).
- Note 3: *The Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023* (resolution A.1186(33)) offer a standardized framework for conducting surveys and certifying ships under major international maritime conventions, ensuring consistent safety and environmental compliance globally.
- Note 4: This Non-exhaustive list has outlined various responsibilities and duties that flag, port, and coastal States must fulfil under instruments relevant to the III Code. The draft amendments to the list derive from amendments to relevant IMO instruments entering into force up to and including 1 July 2026. °

References:

1. American Bureau of Shipping (ABS), News Brief: III 11. https://absinfo.eagle.org/acton/ct/16130/s-10fc-2507:0/Bct/q-039a/1-0393:3d82d/ct1_0/1/lu?sid=TV2%3AAPNmI7lmX
2. Det Norske Veritas (DNV), IMO III 11: Finalized guidance on remote surveys, audits and verifications. <https://www.dnv.com/news/2025/imo-iii-11-finalized-guidance-on-remote-surveys-audits-and-verifications/>
3. IMO, Sub-Committee on Implementation of IMO Instruments (III 11), 21-25 July 2025. <https://www.imo.org/en/mediacentre/meetingsummaries/pages/iii-11th-session.aspx>
4. InterManager, Summary Report on IMO Sub-Committee meeting III 11. <https://www.intermanager.org/2025/07/summary-report-on-imo-sub-committee-meeting-iii-11-21-25-july-2025-167386/>
5. Lloyd's Register (LR), Implementation of IMO Instruments (III 11) Summary Report. <https://maritime.lr.org/III-11-Summary-Report>