

I. IMO Legal Committee, 112th session (LEG 112)

IMO Legal Committee 112th session, held from March 24th to 28th, 2025, at the IMO Headquarters in London. Key outcomes for LEG 112 are as follows:

1. Adopted the *Guidelines on fair treatment of seafarers detained concerning alleged crimes*.

IMO adopted the Guidelines to protect seafarers from unfair treatment when detained in foreign jurisdictions concerning alleged crimes committed at sea.

The Guidelines aim to protect seafarers' rights and ensure they are treated fairly in all jurisdictions. It covered issues related to due process, protection from arbitrary detention, coercion, or intimidation, and ensuring that wages, medical care, and repatriation rights remain intact during any legal proceedings. It also urged the improvement of coordination among countries, including port States, flag States, coastal States, States of which the seafarer is a national, as well as shipowners and seafarers.

2. Addressing the seafarer abandonment issue

IMO and the International Labour Organization (ILO) had set up a database ([IMO/ILO joint database](#)) on Abandonment of Seafarers, a collaborative effort to tackle the urgent problem of seafarers being abandoned in ports worldwide. According to the database, 310 new cases were reported in 2024, more than double the 142 cases recorded in 2023.

LEG 112 also urged Member States and stakeholders to implement the "Guidelines on how to deal with seafarer abandonment cases" (Resolution LEG.6(110)), emphasizing the development of national Standard Operating Procedures (SOPs) for flag States, port States, and countries of seafarers' nationality or residence.

IMO also confirmed the effort of the International Chamber of Shipping (ICS) for the ongoing work by the Task Force to review and update the ILO/IMO Joint abandonment database.

3. Progress towards the 2010 HNS Protocol

The HNS Convention was adopted by an international conference in 1996, superseded by the 2010 Protocol in April 2010, but has not yet entered into force. It aims to ensure adequate, prompt, and effective compensation for those affected by incidents involving hazardous and noxious substances (HNS) carried on ships. This is particularly relevant given the increasing amounts of chemicals and new fuels transported in bulk in ships.

Currently, there are eight Contracting States to the 2010 Protocol to the HNS Convention, five of which have more than 2 million units of gross tonnage each. Which means there're only four more ratifications with the required contributing cargo to meet the entry-into-force requirements of the Protocol.

Belgium, Germany, the Kingdom of the Netherlands, Sweden, and Finland have provided information about their progress towards ratification in a coordinated manner. Once those ratifications are complete, the requirements of the entry-into-force would be met. IMO encouraged more Member States to ratify and bring into force the 2010 HNS Protocol as well.

4. Revised the Maritime Autonomous Surface Ships (MASS) roadmap

LEG 112 continues to examine legal issues, in particular the 1982 United Nations Convention on the Law of the Sea (UNCLOS), which would be relevant, such as search and rescue obligations, jurisdiction over remote operations centers, workforce impacts, regulatory standardization, and liability frameworks.

LEG approved the report of the third meeting of the Joint MSC-LEG-FAL Working Group on MASS (MASS-JWG 3), held in May 2024. LEG also revised the Mass Road Map to comply with the MASS Road Map plan of the MSC 109, and extended the goal to 2027 (see Table 1).

Table 1 LEG 112 MASS Code Roadmap Working Plan

Meeting Date	Working Plan
LEG 112 (Spring, 2025)	<ol style="list-style-type: none"> 1. Assess the finalized non-mandatory MASS Code and consider the need for amendments to, or interpretations of, treaties under the purview of the Legal Committee based on the outcomes of the MASS-JWG, MSC, and FAL; 2. Consider proposals to develop guidelines on the implementation of LEG instruments by MASS 3. Updated the Roadmap considering the need.
LEG 113 (Spring, 2026)	<ol style="list-style-type: none"> 1. Assess the approved mandatory MASS Code and consider the need for amendments to, or interpretations of, treaties under the purview of the Legal Committee 2. Updated the Roadmap considering the need.
LEG 114 (Spring, 2027)	Adopt or approve amendments to, or interpretations of, treaties under the purview of the Legal Committee.

(Source: IMO LEG 112 meeting document: LEG 112/9/2 Annex.)

5. Substandard shipping – new output approved for regulatory scoping exercise

LEG 112 had discussed the need to address the issue of substandard shipping regulatory scoping exercise (RSE), for the rise of cases on unlawful operations, which distort the global playing field and increase risks to safety, security, and the environment. Approved the proposal to conduct a regulatory scoping exercise to review IMO conventions and other tools available to Member States, with the aim of developing actions to prevent unlawful operations, including substandard shipping.

A correspondence group was established to start working on this new output, following approval of the IMO Council in July 2025.

6. Development of guidelines or best practices on ship registration (new output approved)

LEG 112 reaffirmed the importance of due diligence, transparency, and international cooperation to prevent fraudulent registries and false flags. From the report of the Correspondence Group established at LEG 110, the concerns were raised regarding the "Due Diligence" processes in the ship registration issues.

Most Member States confirmed that they review paper documents and verify information during ship registration, utilizing technical platforms for cross-verification to prevent the misuse of IMO identification numbers. However, systemic issues such as insufficient manpower, delays in information sharing, and complex ownership structures can be exploited by malicious actors to commit fraudulent registrations. To address these challenges, the Legal Committee agreed to continue its work on preventing fraudulent ship registrations and the misuse of IMO identification number schemes.

7. Liability and compensation regimes for alternative fuels (new output approved)

The proposal received strong support, with members agreeing to include it in the 2026-2027 agenda. LEG 112 approved a new output on the Title: "Suitability of IMO liability and compensation regimes with respect to alternative fuels". LEG will conduct a gap analysis to determine whether new legal instruments are necessary or if amendments to existing frameworks are sufficient, with a target completion year of 2027.

The new output will consider the continuing and widespread uptake of alternative fuels, including ammonia, methanol, hydrogen, biofuels, and liquefied natural gas (LNG), which

present different risks to those posed by traditional hydrocarbon mineral fuels, such as oil. The aim is to assess whether existing liability and compensation frameworks remain adequate.

References:

1. IMO, Legal Committee, 112th session (LEG 112), 24- 28 March 2025. <https://www.imo.org/en/MediaCentre/MeetingSummaries/Pages/LEG-112th-session.aspx>
2. IMODOCS, LEG 112/WP.1/Rev.1.
3. 大連海事大學，〈IMO LEG 112 主要成果〉。 <https://imcrc.dlmu.edu.cn/info/1128/8729.htm>

II. IMO Marine Environmental Protection Committee 83rd session (MEPC 83) Meeting Highlights

IMO Marine Environmental Protection Committee 83rd session (MEPC 83) was held from 7 to 11 April 2025. Key outcomes from the meeting are as follows:

1. **Approved the Short-term and Mid-term measures for reducing GHG emissions from international shipping**

Adopted the amendments to the Carbon intensity (CII) reduction factors for 2027-2030: IMO had completed the Phase 1 review of IMO's short-term GHG reduction measures. Under Phase 1, the Committee gathered data from Member States about their experience implementing the short-term measures, analyzed this data, and identified a list of challenges and/or gaps.

MEPC 83 agreed on a work plan for Phase 2 of the review of the short-term GHG reduction measures, to run from Spring 2026 to Spring 2028. Phase 2 will look at enhancing the SEEMP framework, further developing CII metrics, as well as ensuring synergies between the IMO carbon intensity/energy efficiency framework and the IMO Net-Zero Framework.

2. **Agreed to update the data in the IMO data collection system (DCS) on ship fuel consumption**

MEPC approved amendments to regulation 27 of MARPOL Annex VI concerning accessibility to the IMO Ship Fuel Oil Consumption Database (IMO DCS), and the associated guidelines on data management. The IMO DCS requires ships to record and report their fuel oil consumption, and this data is subsequently used to calculate the ship's operational carbon intensity index (CII).

The amendment will ensure that all reported data is available to Parties to Annex VI in a non-anonymized form. Once the amendments enter into force, public user accounts will be able to access a database with anonymized aggregated data, where identification of specific ships will not be possible.

3. **Adopted amendments to MARPOL Annex VI and the NO_x Technical Code to allow for the use of multiple engine operational profiles**

FAL has approved the work plan for the development of a comprehensive IMO Strategy on Maritime Digitalization, which aims at harnessing emerging technologies to enhance efficiency, safety, and sustainability in the shipping industry.

FAL formed a Correspondence Group to continue work to define the strategy's scope, key objectives, and implementation framework. The Correspondence Group will work over the coming year to identify existing and emerging technologies, standards, and methodologies that can support maritime digitalization, while ensuring alignment across IMO's various committees, and will submit a report for consideration at the next session Committee (FAL 50).

4. Guidelines for the development of the Inventory of Hazardous Materials (IHM)

MEPC adopted the amendments to the 2023 Guidelines for the development of the Inventory of Hazardous Materials (IHM Guidelines) ([Res. MEPC.379\(80\)](#)) were clarifying the relevant threshold for cybutryne contained in antifouling systems when samples are taken directly from the hull or from wet paint containers.

The development of the Inventory of Hazardous Materials is related to the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships (Hong Kong Convention).

5. Agreed to an experience-building phase for the Hong Kong Convention on ship recycling

The Hong Kong Convention (HKC) will take entry into force in June 2025, heralding a new era in ship recycling by introducing safety, human health, and environmental requirements at the end of the life of ships.

By facilitating a smooth implementation of the HKC during the experience-building phase, stakeholders can work towards a cohesive approach that not only adheres to international norms but also supports continuous improvement and transparency.

6. Approved the including the development of a legally binding instrument on biofouling Convention on Biofouling

IMO approved the Guidance on in-water cleaning of ships' biofouling, which will be addressed as the circular [MEPC.1/Circ.918](#). The Guidance on in-water cleaning of ships is to support the 2023 Biofouling Guidelines as well. MEPC had agreed on the new output on the "Development of a legally binding framework for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species- a biofouling Convention."

References:

1. American Bureau of Shipping (ABS), News Brief: MEPC 83.
<https://ww2.eagle.org/content/dam/eagle/regulatory-news/2025/MEPC-83-Brief.pdf>

2. Det Norske Veritas (DNV), IMO MEPC 83: GHG Requirements Approved, Taking Effect from 2028. News from DNV. <https://www.dnv.com/news/imo-mepc-83-ghg-requirements-approved-taking-effect-from-2028/>
3. InterManager, Summary report on IMO Marine Environment Protection Committee MEPC 83. <https://www.intermanager.org/wp/wp-content/uploads/2025/04/IMO%20MARINE%20ENVIRONMENT%20PROTECTION%20COMMITTEE%2083,%207-11%20April%202025.pdf>
4. Lloyd's Register (LR), MEPC 83 Summary Report. <https://maritime.lr.org/MEPC-83-Summary-Report>
5. ClassNK, Preliminary Report of MPEC 83. https://www.classnk.or.jp/hp/pdf/info_service/imo_and_iacs/MEPC83_sumE.pdf
6. IMO, Marine Environment Protection Committee (MEPC 83), 7 to 11 April 2025. <https://www.imo.org/en/MediaCentre/MeetingSummaries/Pages/MEPC-83rd-session.aspx>
7. 財團法人驗船中心，《MEPC 83 會議快報》。 <https://www.crclass.org/wp-content/uploads/2025/04/MEPC83%E6%9C%83%E8%AD%B0%E5%BF%AB%E5%A0%B120250412.pdf>
8. 中國船級社，《MEPC 第 83 屆會議要點快報》。 <https://www.ccs.org.cn/ccswz/file/download?fileid=202504140874585632>。