

Summary of the meeting of the 10th session of IMO's Sub-Committee on Implementation of IMO Instruments (III)

The 10th meeting of IMO's Sub-Committee on Implementation of IMO Instruments (III) met recently and IMCA participated in a Working Group which considered:

- 1) [Revision of the Survey Guidelines under the Harmonized System of Survey and Certification \(HSSC\) 2023](#)
- 2) [The Non-exhaustive List of Obligations](#)
- 3) [The development of Guidance on Remote Surveys, Audits, and ISPS Code Verifications](#)
- 4) [Harmonization of Port State Control \(PSC\) activities](#)

1 **Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) 2023 (Resolution A.1186(33))**

The Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) were originally adopted as Assembly Resolution A.746(18). Since then, the guidelines have been reviewed and updated to accommodate new regulatory requirements. While these guidelines have not been made mandatory by the IMO, the guidelines are mandatory for all European Union Recognised Organisations under EU Regulation 391/2009.

The Working Group was tasked with:

- 1) Reviewing the outcome of the analysis of footnotes contained in the text of the Survey Guidelines under the HSSC, in particular the associated proposed amendments, as set out in [Annex 1 to document III 10/9](#);
- 2) Reviewing the outcome of the preliminary gap analysis, as set out in [Annex 2 to document III 10/9](#), in particular the proposed draft amendment to the Survey Guidelines for adoption by the 34th IMO Assembly in December 2025;
- 3) Continuing to develop draft amendments to the Survey Guidelines under the HSSC, 2023, as contained in part 1 of [Annex 3 to document III 10/9](#), deriving from the amendments to the relevant mandatory IMO instruments entering into force up to and including 31 December 2025, for adoption by the 34th IMO Assembly in December 2025.

Good progress was made on the revision of the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) 2023, [Resolution A.1186\(33\)](#). The draft revision will incorporate relevant survey requirements for mandatory instruments that will enter into force up to and including 31 December 2025, as well as amendments to SOLAS with the four-year cycle of entry into force. The revised guidelines are expected to enter into force on 1 January 2026.

Work will continue intersessionally by correspondence on a number of issues and the MPRA Committee will participate in this work on behalf of members.

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1.1 Updating the coding of the HSSC Guidelines for the eligibility of remote survey

The Working Group discussed the feasibility of developing and assigning a coding system to update the HSSC Guidelines to indicate the eligibility of remote survey for each survey item to assist flag Administrations. A correspondence Group will continue the work intersessionally to develop and update the coding of the HSSC Guidelines for finalisation at the next session of the III Sub-Committee (III 11) which will meet in 2025.

1.2 Survey Guidelines relevant to the IP Code

Of particular note to IMCA members will be the development of amendments to Survey Guidelines to address survey items relevant to the International Code of Safety for Ships Carrying Industrial Personnel (IP Code). The work will move forward taking into account [Annex 5 to document III 10/9](#), as appropriate.

2 Non-exhaustive List of Obligations under instruments relevant to the IMO instrument implementation Code (resolution A.1187(33))

Due to time constraints, the Working Group was unable to review the draft amendments to the 2023 Non-exhaustive list of obligations under instruments relevant to the IMO instrument implementation Code ([Resolution A.1187\(33\)](#)) and, therefore, agreed to defer the review of draft amendments to the 2023 Non-exhaustive list of obligations under instruments relevant to the IMO instrument implementation Code ([Resolution A.1187\(33\)](#)), deriving from amendments to the relevant mandatory instruments entering into force up to and including 1 July 2026 to the next session of the III Sub-Committee (III 11).

3 Development of Guidance on Assessments and Applications of Remote Surveys, ISM Code Audits and ISPS Code

Good progress was made on further developing draft Guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications, and the associated draft MSC-MEPC circular. The Sub-Committee agreed that:

- 1) Interim, initial, renewal and additional document of compliance (DoC) ISM audits should be in person. For interim DoC audits which add a new ship type, remote methods may be considered.
- 2) Remote ISPS verifications should be limited to extraordinary circumstances due to the sensitive nature of the information.

The work will continue intersessionally to enable the guidance to be finalised at the next session of the III Sub-Committee (III 11) which will meet in 2025 and adopted at the 34th Assembly in December 2025.

4 Draft amendments to the Procedures for Port State Control (PSC), 2023

The Sub-Committee continued discussions on proposed draft amendments to the "Procedures for Port State Control 2023" ([Resolution A.1185\(33\)](#)). The agreed draft amendments include developing PSC Guidelines on control and compliance measures to enhance maritime security, with the aim of including it as a new appendix to the Procedures of PSC, 2023.

Additionally, draft amendments to appendices 2, 8, 9, 11, 18 of the Procedures of PSC, 2023 were agreed, to have a single source for detainable deficiencies to ensure consistent guidance on ship detentions.

The work will continue intersessionally to enable it to be finalised at the next session of the III Sub-Committee (III 11) which will meet in 2025.

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