



# Technical Information

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To : Whom It May Concern

Subject : Summary Report on IMO Meeting of Sub-Committee on Implementation of IMO Instruments 4th Session (III 4)

## Summary

This Technical Information summarizes the result of 4th Session of the IMO Sub-Committee on Implementation of IMO Instruments (III 4) that was held from the 25 to 29 September 2017, at the IMO headquarters in London.

## Information

1. The information provided in this Technical Information are the ones which have high relevance with the work of BKA or considered as an essential information for interested parties.
2. The following agenda are among those discussed during the meeting :

Agenda Number	Topic
5	Measures to harmonize Port State Control (PSC) activities and procedures worldwide
8	Updated Survey Guidelines under the Harmonized System of Survey and Certification (HSSC)

3. The Agenda above are several technical issues discussed during the meeting. A brief coverage among the issues are expressed in the attached document.

More info

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## **BRIEF REPORT ON IMO MEETING OF THE SUB-COMMITTEE ON IMPLEMENTATION OF IMO INSTRUMENTS 4TH SESSION (III 4)**

### **A. MEASURES TO HARMONIZE PORT STATE CONTROL (PSC) ACTIVITIES AND PROCEDURES WORLDWIDE (AGENDA ITEM 5)**

#### **Guidelines and procedures for PSCOS**

In order to provide PSCOs with clear guidance, III 4 finalized draft amendments to resolution A.1052(27) on the Procedures for Port State Control 2011 with a view to adoption at Assembly 30. These amendments take into account the following matters:

- a) Guidelines for port State control officers on certification of seafarers, hours of rest and manning;
- b) STCW.7/Circ.24/Rev.1 on Guidance for Parties, Administrations, port State control authorities, recognized organizations and other relevant parties on the requirements under the STCW Convention, 1978, as amended;
- c) Fire integrity of the bulkheads between the wheelhouse and a toilet inside the wheelhouse, the location of manually operated call points and the minimum width of external escape routes;
- d) Voluntary early implementation of amendments to the 1974 SOLAS Convention and related mandatory instruments.

#### **Issue in relation to the updating of existing ECDIS**

Taking into account the issues relating to the updating of existing ECDIS, and the decisions taken by the Sub-Committee on Navigation, Communication and Search and Rescue (NCSR), at its third session, to amend the deadline for updating the display and testing standards S-52, S-57, S-63 and S-64 from 1 September 2016 to 1 September 2017, III 4 issued a circular on action to be taken by port states on the required updates of electronic chart display and information systems (ECDIS).

This circular outlines the procedures for PSC officers (PSCOs) to inspect ships, which carry ECDIS units that have not been updated, in a pragmatic and practical manner.

### **B. UPDATED SURVEY GUIDELINES UNDER THE HARMONIZED SYSTEM OF SURVEY AND CERTIFICATION (HSSC) (AGENDA ITEM 8)**

#### **The voluntary early implementation of amendments to the 1974 SOLAS convention and related mandatory instruments**

The Sub-Committee noted that MSC 98 endorsed the view that voluntary early implementation should be communicated to the Organization by Contracting Governments to the 1974 SOLAS Convention for dissemination through a new area "Voluntary early implementation" to be created in the GISIS module on "Survey and Certification".

Furthermore, it was agreed that a Contracting Government to SOLAS may also consider the use of the existing provisions for equivalent arrangements under SOLAS regulation I/5 to cover the interim period between the date of the voluntary early implementation and the entry-into-force date of the amendment(s).

Following the approval of MSC.1/Circ.1565 on Guidelines on the voluntary early implementation of amendments to the 1974 SOLAS Convention and related mandatory instruments by MSC 98, III 4 agreed to establish a dedicated MSC circular series, i.e."MSC.7" to identify more easily MSC circulars issued on early implementation and recommended its approval to MSC 99.

### **Exemption of survey and certification requirements under the MARPOL Convention for Unmanned Non-Self-Propelled (UNSP) Barges**

Having noted the draft amendments to MARPOL Annexes I, IV and VI concerning the exemption of UNSP barges from survey and certification requirements, together with the associated draft Guidelines for exemption of unmanned non-self-propelled (UNSP) barges from the survey and certification requirements under the MARPOL Convention, III 3 had agreed to the following recommendations of the Drafting Group established at III 3 that:

- a) the exemption certificates for UNSP barges should be part of the individual MARPOL Annexes I, IV and VI, rather than appendices to an MEPC circular;
- b) more study and work needed to be carried out if the exemption certificates are made part of the individual MARPOL Annexes I, IV and VI; and
- c) the issue regarding definitions or identification of UNSP barges needed to be further considered.

However, it was noted that there is no paper submitted on above issues, at this session, for the consideration of the sub-committee, interested delegations are invited to make relevant submission to its next session, which will facilitate the work on this item.

### **Consistency of in-water survey (IWS) provisions for passenger and cargo ships**

MSC 98 considered proposal from IACS regarding rudder bearing clearances on cargo and passenger ships, for removal of perceived inconsistency between the in-water survey (IWS) provisions for passenger and cargo ships by dispensing the requirement to take measurements of the rudder bearing clearances on cargo ships and noted that the following concerns were expressed on the IACS's proposal:

- 1) survey regimes of cargo and passenger ships under SOLAS regulations are different in general; and
- 2) data analysis should not be limited to mean values but should also take into account extreme values.

Following its consideration, MSC 98 agreed to instruct III 4 to further consider the issue raised by IACS taking into account the aforementioned concerns, and prepare draft amendments to the Survey Guidelines under the HSSC, if appropriate, with a view to adoption by A 30.

After in-depth discussion at this session on the related issue, III 4 noted discrepancies between resolution A.1104(29) on Survey Guidelines under the HSSC, 2015 and MSC.1/Circ.1348 on Guidelines for the assessment of technical provisions for the performance of an in-water survey in lieu of bottom inspection in dry-dock to permit one dry-dock examination in any five-year period for

passenger ships other than ro-ro passenger ships. Therefore, III 4 decided to seek technical input from the SDC Sub-Committee prior to considering further the above issues.

### **Survey Guidelines for the Purpose of the BWM Convention under the Harmonized System of Survey and Certification**

MEPC 71 adopted resolution MEPC.287(71) on Implementation of the BWM Convention, in lieu of the implementation schedule recommended in resolution A.1088(28) and instructed III 4 to incorporate the Interim Survey Guidelines for the purpose of the BWM Convention under the Harmonized System of Survey and Certification (BWM.2/Circ.7), in the draft amendments to the Survey Guidelines under the HSSC, 2015, with a view to submission to A 30 for adoption.

MEPC 71 also instructed III 4 to introduce provisions in the amendments to the Survey Guidelines under the HSSC for validating the compliance of individual BWM System (BWMS) with regulation D-2 of the BWM Convention in conjunction with their commissioning.

After discussion, the Sub-Committee agreed:

1. to draft amendments to the Survey Guidelines under the HSSC, on the basis of the Interim Survey Guidelines for the purpose of the BWM Convention under the Harmonized System of Survey and Certification (BWM.2/Circ.7); and
2. to a new draft survey item (BI)1.1.2.18bis to address the instruction of MEPC 71 to introduce provisions for validating the compliance of individual BWMS, with regulation D-2 of the BWM Convention at the commissioning stage.
3. that the initial surveys already conducted have been based on the Interim survey guidelines as provided in BWM.2/Circ. 7 and that the applicability of the new survey item (BI)1.1.2.18bis should not apply to those vessels which have already been subject to an initial survey.

While, III 4 could not reach agreement on matters regarding issues such as, which entity will be responsible (shipyard, owner, manufacturer, flag State or RO), and how compliance would be verified, whether existing guidelines would be applicable or new ones would need to be developed, etc. However, III 4 concluded that such matters would be beyond its remit and may need to be considered by MEPC based on submitted proposals.

Moreover, III 4 invited the MEPC to consider whether detailed aspects of the validation of the compliance of individual BWMS with regulation D-2 of the BWM Convention in conjunction with their commissioning need to be addressed.

### **Amendments to survey guidelines under the HSSC**

III 4 agreed to the draft amendments to the Survey Guidelines under the HSSC, 2015 (resolution A.1104(29)), together with the draft requisite Assembly resolution, for submission, as a consolidated version, to A 30 for consideration with a view to adoption.

The amendments include:

- a) revision of paragraph 5.13 and items (CR) 2.4.5bis.6, (CI) 2.1.3.73, (CA) 2.2.2.37, (PI) 5.1.2.145, (PR) 5.2.2.121, (PR) 5.2.2bis.23, and (OIn) 1.3.4.4.3

- b) some editorial changes, including a footnote reference to (AI) 4.1.1.3bis regarding exhaust gas cleaning system.

It was also agreed that the Secretariat be authorized, when preparing the final texts of the consolidated Survey Guidelines, as appropriate, to effect any editorial corrections that may be identified and renumber paragraphs.

As to how to incorporate the Interim Survey Guidelines for the purpose of the BWM Convention under the Harmonized System of Survey and Certification, the Drafting Group restructured the frame of the Survey Guidelines under the HSSC by inserting annex *3bis* on Survey Guidelines under the BWM Convention before annex 4 on Survey Guidelines under mandatory codes.