Future IMO and ILO Legislation

Autumn 2025 – Upcoming changes to mandatory statutory regulations and instruments

Including adopted amendments entering into force on or after 1 December 2025, requirements which have entered force before 1 December 2025 but are phasing in for some ships, and significant developments up to and including the adjourned Marine Environment Protection Committee (MEPC ES.2) in October 2025.

How to use this document

Adopted IMO and ILO legislation

Part 1 – Adopted requirements in a transitional period for full application

This part includes requirements that have already entered into force but are still in a transitional period for their full effect due to a phased approach to their application. For example, some parts of a requirement may apply on different dates depending on the type and size of ship.

Part 2 – Adopted requirements entering into force in future

This part includes requirements that have been adopted and have an entry into force date which has been established by the IMO or ILO, but which has not yet been reached. It also covers requirements that have been adopted but have no certain entry into force date because the conditions for entry into force have not been met.

IMO and ILO legislation in development

Part 3 – IMO and ILO requirements still under development

This part covers requirements that are still under discussion at the IMO and have not been adopted. The entry in force date has not been agreed although a predicted entry into force is suggested. This section is subject to change as discussions progress.

Part 4 – Prospective IMO and ILO requirements

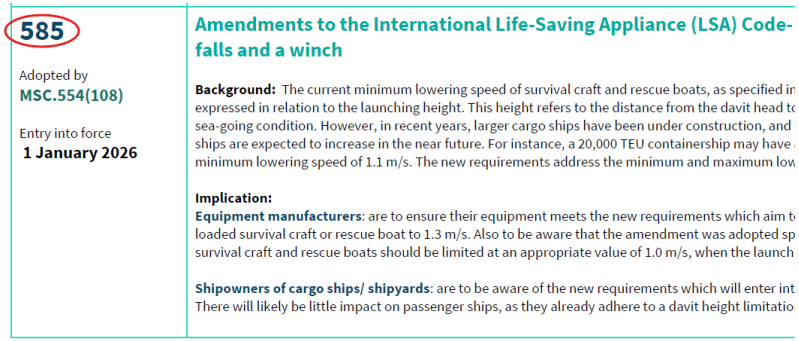
This part covers potential requirements due to be considered at the IMO and ILO.

Part 5 – Changes since the previous version

This part lists the changes since the last edition of this document.

Tables – quick references for application

The tables in the following pages provide a quick reference guide as to which items in this document are relevant for different ship types. This is for general information only and the advice is to study the application for each entry in this document as it can be complex. Each item is assigned an LR reference number, which is shown in the left-hand column of the full entry as shown in the example below and repeated in the index tables. The number in the index table is hyperlinked to the full entry.



585

Adopted by
MSC.554(108)

Entry into force
1 January 2026

Amendments to the International Life-Saving Appliance (LSA) Code- falls and a winch

Background: The current minimum lowering speed of survival craft and rescue boats, as specified ir expressed in relation to the launching height. This height refers to the distance from the davit head t sea-going condition. However, in recent years, larger cargo ships have been under construction, and ships are expected to increase in the near future. For instance, a 20,000 TEU containership may have minimum lowering speed of 1.1 m/s. The new requirements address the minimum and maximum low

Implication:
Equipment manufacturers: are to ensure their equipment meets the new requirements which aim t loaded survival craft or rescue boat to 1.3 m/s. Also to be aware that the amendment was adopted sp survival craft and rescue boats should be limited at an appropriate value of 1.0 m/s, when the launch

Shipowners of cargo ships/ shipyards: are to be aware of the new requirements which will enter int There will likely be little impact on passenger ships, as they already adhere to a davit height limitatio

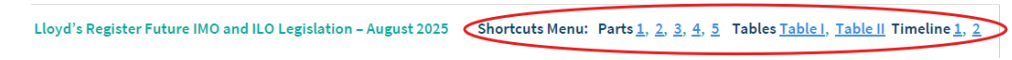
- Table I – All, New or Existing – Adopted amendments coming into effect
- Table II – All, New or Existing – Likely amendments coming into effect

Timelines

The timelines on pages 5, & 6 show significant requirements referenced in this document. The reference number to the top left of each item is hyperlinked to the full entry in the document.

Navigation of this document

The document includes a hyperlinked shortcut menu at the bottom of each page.



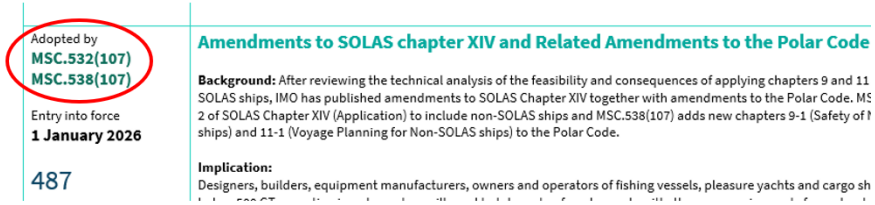
Notes

1. Non-mandatory legislation is not included.
2. Unless otherwise specified, the term ‘cargo ship’ is used to describe any vessel that is not a passenger ship.
3. In the Application section for each entry, references to ’all ships’ should be taken to mean all ships to which that convention, annex or chapter applies, which might include other ships types to those listed in the tables. It is also assumed that ships are engaged on international voyages.
4. Applicability of regulations varies for Floating Storage Units (FSU) and Floating Production Storage and Offloading units (FPSO) depending on whether they are detached and under voyage, or fixed. The application tables in this report reflect only the minimum requirements which are permanently applicable. The same applies to Mobile Offshore Drilling Units (MODU). Requirements for Offshore Supply Vessels (OSVs) are the same as those listed for general cargo ships.
5. Entries marked with an asterisk (*) in the tables have staggered application dates. Application details should be carefully checked.
6. SOLAS amendments now follow a four-year cycle (next entry into force date is 1 January 2028) unless adopted under conditions of exceptional circumstance (see IMO Circular MSC.1/Circ.1481) in which case implementation may be earlier e.g. due to the effects of the Coronavirus pandemic an additional entry into force date of 1 January 2026 for amendments to SOLAS and associated IMO instruments has been agreed.
7. If there is a delay in a new ship's delivery after contract signing, it is important to note that most IMO requirements for new ships apply based on contract date, the keel laying date and the delivery date requirement, so a delay may necessitate different equipment or design.
8. Some requirements only apply to certain operational choices, such as geographical trading area or activities which may or may not be carried out. In these cases, the widest possible applicability is shown in the tables, and it is necessary to assess whether the requirement applies to an individual ship.
9. Occasionally entries are not included in categories in reference tables, in this edition they are under the "other” column. These are entries only concerned with one specialised ship type such as fishing vessels (238) or non-SOLAS ships (487).
10. In the ship type tables, equipment and materials are included to inform material and equipment manufacturers of changes to the equipment standards to enable their planning for amendments to existing designs/materials, developing new designs/material and having those type approved.
    - Equipment is where there are new equipment standards in place, i.e. for SOLAS lifejackets (406).
    - Materials, where there are new materials permitted. i.e. for high manganese austenitic steel (445 and 446).

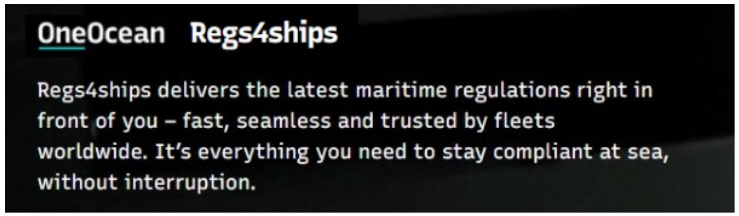
Further information from Lloyd’s Register

As well as this document, we publish reports of IMO meetings which are relevant to our work in Lloyd’s Register (LR). To register to receive these by email, and to download previous documents, please visit www.lr.org/imo.

When clicking on resolutions like below, it will take you to Regs4ships, a subscription service from OneOcean.



Information on the services that Regs4ships offer can be found by clicking below:



Summary of major developments:

This version covers updates from the following IMO meetings; NCSR 12, MSC 110, III 11, CCC 11 and the adjourned MEPC ES.2.

The hyperlinked number in brackets is the LR reference used in this document for the detailed entry.

New approvals or adoptions:

Adopted

- Amendments to paragraph 8.3.5 and annex 1 of the 1994 and 2000 HSC Codes with regard to lifejacket carriage requirements of SOLAS chapter III (609)
- Amendments to SOLAS regulation V/23, MSC resolution on performance standards and consequential amendments to the 1994 and 2000 HSC Codes, to improve the safety of pilot transfer arrangements (642)
- Amendments to the IMSBC Code (Amendment 08-25) (709)

Approved

- Draft amendment to SOLAS regulation IV/5 (Provision of Radiocommunication Services), SOLAS regulation V/4 (Navigation Warnings) and SOLAS regulations V/5 (meteorological services and warnings) (906)
- Draft amendments to SOLAS chapter V to introduce the VHF Data Exchange System (VDES) (606)
- Draft amendments to the LSA code - development of design and prototype test requirements for the arrangements used in the operational testing of free fall lifeboat release systems without launching the lifeboat (607)
- Draft amendment to the 1988 Load Line Protocol, regulation 25 - protection of the crew - setting of guard rails on the deck structure (728)
- Draft amendments to the ESP Code - Remote Inspection Techniques (719)
- Draft amendments to the IP Code - mass of personnel to be used in stability calculation (566)

Significant new items being considered or milestones in ongoing developments:

- Review of the Ballast Water Management Convention (750)
- Review of the Short-Term Reduction Measure (CII and EEXI) (828)
- Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels (823)
- The comprehensive review of the STCW Convention (572)
- Development of a goal-based instrument for Maritime Autonomous Surface Ships (MASS) (497)
- Evaluation of adequacy of fire protection, detection and extinction arrangements in vehicle, special category and ro-ro spaces in order to reduce the fire risk of ships carrying new energy vehicles (767)

Timeline 1 – Future Safety Requirements

LSA Code
(607) Operational testing of freefall lifeboat release systems without launching: Design and prototype test

ESP Code
(719) Remote Inspection Technique

IMSBC Code
(934) Amendments to the IMSBC

SOLAS IV and V
(906) (IV/5) Radiocommunication, (V/4) Navigation, (V/5) meteorological

ICLL
(728) Protection of the crew, setting of guard rails on the deck structure

Various
(823) Safety regulatory framework to support GHG reduction

IMDG Code
(807) Draft amendments (43-26)

IGC Code
(528) 2028 Version

SOLAS II-1
(834) Gaseous fuels within the scope of the IGF Code

SOLAS II-1/2
(917) Amendments to IGF Code

STCW Convention & Code
(572) Comprehensive review

SOLAS II-1 and V
(721) Traditional and non-traditional propulsion and steering systems' requirements

MASS Code
(497) Development of MASS

Under development

2026	2027	2028 or later

Adopted

SOLAS II-1
(383) Lifting appliances & anchor handling winches

SOLAS II-2
(413) (650) (651) Prohibitions of PFOS in firefighting foams
(409) Fire safety on ROPAX
(412) Fire protection of cargo ship control stations

SOLAS III
(661) Amendments to MSC.402(96) ventilation systems for lifeboats

SOLAS V
(491) Mandatory carriage of electronic inclinometers on container ships & bulk carriers
(532) Mandatory reporting of lost containers

LSA Code
(395) Ventilation of totally enclosed lifeboats (For those installed on or after 1 Jan 2029)
(379) Single fall & hook systems
(406) In-water performance of lifejackets
(585) Lowering speed of survival craft and rescue boat

FSS Code
(658) Amendments related to fire safety on ROPAX

STCW Code
(573) Prevention of sexual assault and sexual harassment

IGC Code
(785) Amendments related to use of ammonia cargo as fuel – voluntary early implementation. Full entry into force 1 July 2026.

IGF Code (2026)
(431) Various amendments

IGF & IGC Code
(445 & 446) Use of high manganese austenitic steel for cryogenic service

Grain Code
(527) New class of loading conditions

IMDG Code
(525) Amendment (42-24) development

Polar Code
(487) Non-SOLAS ships operating in Polar waters

ILO - Draft amendments to MLC, 2006
(ILO16) Standard A2.5.1 on repatriation
(ILO17) Standard A2.4 on shore leave
(ILO20) investigation of marine casualties
(ILO21) onboard complaints procedures
(ILO23) prevention of shipboard violence and harassment, including sexual harassment, bullying, and sexual assault

IMSBC Code
(709) Draft Amendments (08-25)

HSC Code
(609) Draft amendment concerning lifejacket requirements

SOLAS V
(642) Pilot Transfer Arrangements

IGF Code (2028)
(708) Various amendments

SOLAS II-1
(442) Emergency towing arrangements on ships other than tankers

Note: The number put in parentheses refers to the item number in LR "Future IMO and ILO Legislation" publication.

Timeline 2 – Future Environmental Requirements

Under development

MARPOL Annex VI
(828) Short-Term Measure Review
(613) IMO Net-zero Framework
(888) Emission Control Areas NOx and SOx
(896) Regulation 27 DCS data access

BWM Convention
(750) Review of the Ballast Water Convention following experience building phase

MARPOL Annex IV
(637) Revised standards for sewage treatment plants and effluent monitoring

2026 | **2027 or later**

Adopted

MARPOL Annex VI
Future Emission Control Areas (NOx, SOx)
(771) Norwegian Sea ECA &
(770) Canadian Arctic ECA

NOx Technical Code
(731) Re-certification procedures of existing engines

MARPOL Annex VI & NOx Technical Code
(467) Multiple engine profiles for optimal performance

Under discussion

Adopted

Note: The number put in parentheses refers to the item number in LR "Future IMO and ILO Legislation" publication.

Table I – All NEW and EXISTING SHIPS – Adopted amendments coming into effect (A=All, N=New, E=Existing)

	Page	Item Number	Passenger Ships	Ro-Ro Passenger Ships	Oil Tankers	Chemical Tankers	Gas Carriers	Bulk Carriers	Container Ships	General Cargo Ships	Ro-Ro Cargo Ships	High Speed Craft	FSU and FPSO	MODU	Yacht	Special Purpose Ships	Other ship types	Equipment	Materials
Prior to 1 December 2025	12	341	E	E															
		370	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		373*	N	N	N	N	N	N	N	N	N						N		
		377	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		368	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
		386			A														
		350	N	N	N	N		N	N	N	N	N			N	N	N		
		365	A	A	A	A	A	A	A	A	A				A	A	A	A	
		366	N	N	N	N	N	N	N	N	N				N	N	N		
		374							N	N	N							N	
		403	N	N	N	N		N	N	N	N	N			N	N	N		
		155	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		A
		188/264*	N	N	N	N	N	N	N	N	N						N		
1 January 2026	32	379	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		383	A	A	A	A	A	A	A	A	A				A	A	A	A	
		395	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		406	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		409		A							N								
		412			N	N	N	N	N	N	N				N	N	N		
		413	A	A	A	A	A	A	A	A	A				A	A	A	A	
		431	A	A	A	A		A	A	A	A	A			A	A	A		
		445					A												A
		446	A	A	A	A		A	A	A	A	A			A	A	A		A
		449	A	A	A	A	A	A	A	A	A				A	A	A		
		487			A	A	A	A	A	A	A	A			A	A	A		
		491						N	N									N	
		525	A	A	A	A	A	A	A	A	A	A			A	A	A		
		527						A		A									

	Page	Item Number	Passenger Ships	Ro-Ro Passenger Ships	Oil Tankers	Chemical Tankers	Gas Carriers	Bulk Carriers	Container Ships	General Cargo Ships	Ro-Ro Cargo Ships	High Speed Craft	FSU and FPSO	MODU	Yacht	Special Purpose Ships	Other ship types	Equipment	Materials
1 January 2026	44	532	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		556			A			A											
		573	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		585	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		650										A						A	
		651										A						A	
		658	N	N	N	N	N	N	N	N	N				N	N	N	N	
		661	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		670															A		
		671															A		
		676	A	A	A	A	A	A	A	A	A				A	A	A		
1 March 2026	51	770	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		771	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
1 July 2026	52	785					A												
1 September 2026	52	731	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	
1 January 2027	52	709						A		A									
1 March 2027	57	467	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
23 December 2027	55	ILO16	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		ILO17	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		ILO20	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		ILO21	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
		ILO23	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
1 January 2028	58	442	N	N				N	N	N	N				N	N	N		
		609										A							
		642	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		708	A	A	A	A		A	A	A	A	A			A	A	A		
Adopted not yet met entry into force	60	238															A		

Table II – All NEW and EXISTING SHIPS – Likely amendments coming into effect (A=All, N=New, E=Existing)

	Page	Item Number	Passenger Ships	Ro-Ro Passenger Ships	Oil Tankers	Chemical Tankers	Gas Carriers	Bulk Carriers	Container Ships	General Cargo Ships	Ro-Ro Cargo Ships	High Speed Craft	FSU and FPSO	MODU	Yacht	Special Purpose Ships	Other ship types	Equipment	Materials
Expected 1 September 2027	66	813	A	A	A	A	A	A	A	A	A	A			A	A	A		
		888	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
Expected 1 January 2028	67	566			N	N	N	N	N	N	N	N					N		
		606	A	A	A	A	A	A	A	A	A				A	A	A	A	
		607			A	A	A	A	A	A	A				A	A	A	A	
		719			A			A											
		728	N	N	N	N	N	N	N	N	N	N	N		N	N	N		
		734															A		
		807	A	A	A	A	A	A	A	A	A	A			A	A	A		
		885	A	A	A	A	A	A	A	A	A	A			A	A	A		
		934						A		A									
Expected 1 March 2028	74	613	A	A	A	A	A	A	A	A	A	A			A	A	A		
Expected 1 April 2028	76	378	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
Expected 1 June 2028	77	750	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
Expected 1 July 2028	80	528					A												
		834	A	A	A	A		A	A	A	A	A			A	A	A		
		917	A	A	A	A		A	A	A	A	A			A	A	A		
Expected 1 January 2030	82	828	A	A	A	A	A	A	A	A	A	A			A	A	A		
Expected 1 June 2031	83	637	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	
Expected 1 July 2031	84	572	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A		
Expected 1 January 2032	84	497			A	A	A	A	A	A	A				A	A	A		
		586	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		589	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		590							N									N	
		608	N	N	N	N	N	N	N	N	N				N	N	N	N	
		721	N	N	N	N	N	N	N	N	N				N	N	N		

	Page	Item Number	Passenger Ships	Ro-Ro Passenger Ships	Oil Tankers	Chemical Tankers	Gas Carriers	Bulk Carriers	Container Ships	General Cargo Ships	Ro-Ro Cargo Ships	High Speed Craft	FSU and FPSO	MODU	Yacht	Special Purpose Ships	Other ship types	Equipment	Materials
Expected 1 January 2032	90	850	A	A	A	A	A	A	A	A	A	A			A	A	A	A	
		859	N	N	N	N	N	N	N	N	N				N	N	N		
Expected Other	91	823	A	A	A	A	A	A	A	A	A	A			A	A	A		
Proposed IMO / ILO work	95	737							A	A									
		831					A												
		610	N	N	N	N	N	N	N	N	N	N			N	N	N		
		767		N							N								

Part 1

Adopted IMO and ILO requirements in a transitional period

This part includes requirements that have already entered into force but are still in a transitional period for their full effect due to a phased approach to their application. For example, some parts of a requirement may apply on different dates depending on the type and/or size of ship.

341

Adopted by
MSC.436(99)

Entry into force
1 January 2020

Amendments to SOLAS II-1/1 and II-1/8-1.3 requiring the provision of computerised stability support for the master in case of flooding

Background: Amendments to SOLAS chapter II-1 to require the provision of a computer able to carry out damage stability calculations on existing passenger ships were considered to be necessary to support the master in the case of flooding.

SOLAS chapter II-1/1 makes it clear which regulations are applicable to "new" and "existing" ships. Regulation II-1/8-1 has been amended to include a requirement for crews onboard existing passenger ships to have the capability to assess stability after damage, either onboard or with onshore assistance. New passenger ships (keels laid on or after 1 January 2014) are already required to provide this.

Implication: Existing passenger ships will have to be provided with suitable stability support. Obtaining the data needed for developing the hull model could be challenging and owners are recommended to start considering what is needed at the earliest opportunity. Loading instruments which comply with IACS UR L5 (Rev.4 June 2020) Type 4 Stability Software will meet these requirements.

Application: Passenger ships constructed before 1 January 2014 of 120m or more in length or with three or more main fire zones are to comply from the first Passenger Ship Safety Certificate renewal survey after 1 January 2025.

Related Instruments

- **MSC.1/Circ.1589 - Guidelines on operational information for masters in case of flooding for passenger ships constructed before 1 January 2014**

370

Adopted by
MEPC.324(75)

Entry into force
1 April 2022

Class News
No. 02/2022

Amendments to regulations 2, 14 and appendix VI of MARPOL Annex VI with regard to in-use fuel-oil sampling points, including corresponding amendments to the supplement to the IAPP certificate

Background: The IMO had previously concluded sampling guidelines for fuel in use (MEPC.1/Circ.864), but without specifying the actual requirements for a ship to have such a sampling point in MARPOL. These amendments introduce procedures for sampling and verification of the sulphur content of fuel oil including those requirements for in-use fuel oil sampling points.

The amendments concerning sampling points consist of the following parts:

- MARPOL Annex VI regulation 2; a new definition in regulation 2 on low flashpoint fuel, for which sampling points will be exempted.
- MARPOL Annex VI regulation 14; requirements on in-use fuel oil sampling points.

Implication:
Ship designers: are to ensure that the suitable installation or sampling point arrangements are considered in the design of the vessel, for availability to carry out in-use fuel oil sampling in order to comply with the requirements of MARPOL Annex VI, Regulation 14.

Shipowners and/or Operators: are to arrange for in-use fuel oil sampling points to be installed or designated (in accordance with MEPC.1/Circ.864/Rev.1) and ensure the arrangement is described in either a piping diagram or other relevant documents and made available for survey.

Application: Sampling point(s) are to be fitted or designated for the purpose of taking representative samples of the fuel oil being used on board ships as follows:

- All new ships of 400GT and over constructed on or after 1 April 2022. "*Ships constructed*" means ships the keels of which are laid or that are at a similar stage of construction.
- All existing ships (i.e. ships constructed before 1 April 2022) of 400GT and over will be required to comply at the first renewal survey of the IAPP certificate on or after 1 April 2023.

Related Instruments

- **MEPC.1/Circ.864/Rev.1 - 2019 Guidelines for on board sampling for the verification of the sulphur content of the fuel oil used on board ships**

373

Adopted by
MEPC.324(75)

(**MEPC.324(75)** has been consolidated into **MEPC.328(76)**)

Entry into force
1 April 2022

Amendments to Chapter 4 of MARPOL Annex VI: Regulation 24 - Phase 3 Implementation of Energy Efficiency Design Index (EEDI)

Background: Amendments to the time period and the reduction rates for EEDI phase 3 requirements for certain ship types and sizes as shown in the table below have been adopted. The implementation of Phase 3 EEDI reduction factor requirements (Table 1 of Regulation 24, MARPOL Annex VI) has been divided in two stages or 'Tranches'. The Phase 3 (Tranche 1) requirements entered into force from 1 April 2022 (for Gas carriers of 15,000 DWT and above, Container ships, General cargo ships, LNG carriers, Cruise passenger ships having non-conventional propulsion) and the Phase 3 (Tranche 2) requirements entered into force on 1 January 2025, as shown in the below Table.

Ship Type	Size	Phase 3 (Tranche 1) 1-Apr-22 onward	Phase 3 (Tranche 2) 1-Jan-25 onwards
Bulk carrier	20,000 DWT and above		30
	10,000 DWT and above but less than 20,000 DWT		0-30*
Gas Carrier	15,000 DWT and above	30	~~30~~
	10,000 DWT and above but less than 15,000 DWT		30
	2,000 DWT and above but less than 10,000 DWT		0-30*
Tanker	20,000 DWT and above		30
	4,000 DWT and above but less than 20,000 DWT		0-30*
Container ship	200,000 DWT and above	50	~~30~~
	120,000 DWT and above but less than 200,000 DWT	45	~~30~~

	80,000 DWT and above but less than 120,000 DWT	40	~~30~~
	40,000 DWT and above but less than 80,000 DWT	35	~~30~~
	15,000 DWT and above but less than 40,000 DWT	30	~~30~~
	10,000 DWT and above but less than 15,000 DWT	15-30*	~~0-30*~~
General Cargo ship	15,000 DWT and above	30	~~30~~
	3,000 DWT and above but less than 15,000 DWT	0-30*	~~0-30*~~
Refrigerated cargo carrier	5,000 DWT and above		30
	3,000 DWT and above but less than 5,000 DWT		0-30*
Combination carrier	20,000 DWT and above		30
	4,000 DWT and above but less than 20,000 DWT		0-30*
LNG carrier**	10,000 DWT and above	30	~~30~~
Ro-ro cargo ship (vehicle carrier)**	10,000 DWT and above		30
Ro-ro cargo ship**	2,000 DWT and above		30
	1,000 DWT and above but less than 2,000 DWT		0-30*
Ro-ro passenger ship**	1,000 DWT and above		30
	250 DWT and above but less than 1,000 DWT		0-30*
Cruise passenger ship** having non-conventional propulsion	85,000 GT and above	30	~~30~~
	25,000 GT and above but less than 85,000 GT	0-30*	~~0-30*~~

* Reduction factor to be linearly interpolated between the two values dependent upon ship size. The lower value of the reduction factor is to be applied to the smaller ship size.

** Reduction factor applies to those ships delivered on or after 1 September 2019, as defined in paragraph 2.1 of regulation 2.

Implication: **Ship designers and builders**: The need to consider potential changes to ship/machinery design to reduce GHG emissions will now occur at a different date than indicated previously in Table 1 of MARPOL Annex VI Regulation 24 for some vessel types. This requires planning within the design process as some reduction dates moved earlier to 1 April 2022. There are several ways to achieve this, such as:

- Increase ship size:
- engine power ratio
- Reduce lightship weight
- Innovative solutions (e.g. air bubble – friction reduction)
- Optimise propeller efficiency
- Hydrodynamics improvement
- Speed reduction
- Use of renewable power source (e.g. wind, solar power)

- Low carbon fuels (e.g. LNG)
- Energy saving devices (e.g. WHR, shaft generators)

Shipowners and Ship Managers: There are a number of technical and operational measures that can be considered to reduce GHG emissions. Any EEDI assessments carried out by designers in the initial and final design stages for above mentioned new ships are to adopt the latest reduction factor requirements as per the table above. Owners/Managers considering a major conversion of an existing ship will need to assess if the ship will be considered as a new ship following conversion.

Application: Bulk Carriers, Combination Carriers, Containerships, Cruise Passenger Ships with non-conventional propulsion, Gas Carriers, General Cargo Ships, LNG Carriers, Ro-Ro Cargo Ships, Ro-Ro Cargo (vehicle carrier) Ships, Ro-Ro Passenger Ships, Refrigerated Cargo Carriers and Tankers all of which are new ships, new ships which undergo major conversion or are new or existing ships which undergo major conversion that is so extensive that the ship is regarded by the Administration as a newly-constructed ship.

According to UIs in MEPC.1/Circ.795/Rev.9, for the purpose of EEDI application, a new ship is a ship:

- For ship types where Phase 3 commences with 1 April 2022 and onwards:
  .1 the building contract of which is placed in Phase 3; or
  .2 the building contract of which is placed before Phase 3, and the delivery is on or after 1 April 2026; or
  in the absence of a building contract:
  .3 the keel of which is laid or which is at a similar stage of construction on or after 1 October 2022; or
  .4 the keel of which is laid or which is at a similar stage of construction before 1 October 2022 and the delivery of which is on or after 1 April 2026.
- For ship types where Phase 3 commences with 1 January 2025 and onwards:
  .1 the building contract of which is placed in Phase 3; or
  .2 the building contract of which is placed before Phase 3, and the delivery is on or after 1 January 2029; or
  in the absence of a building contract:
  .3 the keel of which is laid or which is at a similar stage of construction on or after 1 July 2025; or
  .4 the keel of which is laid or which is at a similar stage of construction before 1 July 2025 and the delivery of which is on or after 1 January 2029.

A major conversion means a conversion of a ship:

- Which substantially alters the dimensions, carrying capacity or engine power of the ship;
- Which changes the type of the ship;
- The intent of which in the opinion of the Administration is substantially to prolong the life of the ship;
- Which otherwise so alters the ship that, if it were a new ship, it would become subject to relevant provisions of the present Convention not applicable to it as an existing ship; or
- Which substantially alters the energy efficiency of the ship and includes any modifications that could cause the ship to exceed the applicable required EEDI or the applicable required EEXI.

Related Instruments

- **MEPC.1/Circ.850/Rev.3 - Guidelines for determining minimum propulsion power to maintain the manoeuvrability of ships in adverse**

	conditions • **MEPC.231(65) - 2013 Guidelines for calculation of reference lines for use with the Energy Efficiency Design Index (EEDI)** • **MEPC.233(65) - 2013 Guidelines for calculation of reference lines for use with the Energy Efficiency Design Index (EEDI) for cruise passenger ships having non-conventional propulsion** • **MEPC.364(79) - 2022 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships.** • **MEPC.365(79) - 2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI), as amended by MEPC.374(80) and MEPC.403(83).** • **MEPC.1/Circ.855/Rev.3 - 2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI)** • **MEPC.1/Circ.896 - 2021 Guidance on treatment of innovative energy efficiency technologies for calculation and verification of the attained EEDI and EEXI.** • **MEPC.1/Circ.795/Rev.9 - Unified Interpretations to MARPOL Annex VI**
377 Adopted by **MEPC.329(76)** Entry into force **1 November 2022** Class News No. 08/2023	**Amendments to MARPOL Annex I - Prohibition on the use and carriage for use as fuel of heavy fuel oil by ships in Arctic waters** **Background:** To reduce risks of use and carriage of heavy fuel oil (HFO) as fuel by ships in Arctic waters should an accident occur, amendments to MARPOL Annex I have been adopted which have prohibited the carriage and use of HFO in unprotected fuel tanks from 1 July 2024. Those ships with protected fuel tanks, or any ship registered in a State which borders the coastline of Arctic waters which has been issued with a waiver by its flag Administration, may continue to operate in Arctic waters until 30 June 2029. A full prohibition on the carriage and use of HFO takes effect from 1 July 2029. **Implication:** If a ship has oil fuel tanks which do not comply with regulation 12A of MARPOL Annex 1 or regulation 1.2.1 of Chapter 1, Part II-A of the Polar Code, the use and carriage of oils, other than crude oils, having a density at 15°C higher than 900 kg/m^3 or a kinematic viscosity at 50°C higher than 180 mm2/s (MARPOL Annex I, Regulation 43.1.2), in Arctic waters is prohibited on or after 1 July 2024. For ships which are required to meet the design requirements in regulation 12A of MARPOL Annex I or regulation 1.2.1 of chapter 1 of part II-A of the Polar Code, the use and carriage of oils listed in regulation 43.1.2 of MARPOL Annex I (see above) as fuel is permitted until 30 June 2029. From 1 July 2029 those ships are prohibited from carrying or using such oils in Arctic waters as defined in regulation 46.2 of Annex I. In addition, waivers may be issued by an Administration with a coastline bordering the Arctic, thereby allowing the use and carriage of oils listed in MARPOL Annex I, Regulation 43.1.2 for ships operating under their flag. Any waivers issued will not apply on or after 1 July 2029. **Shipowners** will not need to undertake cleaning and flushing of tanks or pipelines if prior operations have included the use and carriage of oils listed in MARPOL Annex I, Regulation 43.1.2.

Application: All ships operating in Arctic waters with the exception of:

- Ships engaged in securing the safety of ships;
- Ships engaged in search and rescue operations; or
- Ships dedicated to oil spill preparedness and response.

Related Instruments

- **MEPC.1/Circ.915 - Guidelines on mitigation measures to reduce risks of use and carriage for use of HFO as fuel by ships in Arctic waters**

368

Adopted by
MEPC.331(76)

Entry into force
1 January 2023

Class News
No. 04/2022

Amendment to the AFS Convention - Controls on cybutryne

Background: Evidence of the environmental risks from the use of anti-fouling paints that contain cybutryne was submitted to the IMO in February 2019. The evidence was accompanied by a proposal to establish controls on Anti-Fouling Systems (AFS) containing cybutryne. Amendments to Annexes 1 and 4 to the AFS Convention and the form of the International Anti-fouling System Certificate (IAFSC) to include controls on cybutryne were adopted.

Implication: The amendments mean that anti-fouling systems containing cybutryne will not be applied or reapplied to any ship on or after 1 January 2023. Ships* bearing an AFS that contains cybutryne in the external coating layer of their hulls or external parts or surfaces on 1 January 2023 are to either:

- Remove the anti-fouling system; or
- Apply a coating that forms a barrier to this substance leaching from the underlying non-compliant AFS;

at the next scheduled renewal of the anti-fouling system after 1 January 2023, but no later than 60 months following the last application to the ship of an anti-fouling system containing cybutryne.

Shipowners and ship managers should have applied for a survey for the issue of an International AFS Certificate in the amended model form no later than 1 January 2025. That survey should not affect the time available to shipowners and ship managers to comply with the new control measures in Annex 1 to the AFS Convention.

*Ships except:

- fixed and floating platforms, FSUs, and FPSOs that have been constructed prior to 1 January 2023 and that have not been in dry-dock on or after 1 January 2023;
- ships not engaged in international voyages; and
- ships of less than 400GT engaged in international voyages, if accepted by the coastal State(s)

Application: All anti-fouling systems containing cybutryne and all ships*.

Related Instruments

- **MEPC.356(78) – 2022 Guidelines for Brief Sampling of Anti-Fouling Systems on Ships**
- **MEPC.357(78) – 2022 Guidelines for Inspection of Anti-Fouling Systems on Ships**
- **MEPC.358(78) – 2022 Guidelines for Survey and Certification of Anti-Fouling Systems on Ships**

386

Adopted by
MSC.483(103)

Entry into force
1 January 2023

Amendments to the International Code on the Enhanced Programme of Inspections during Surveys of Bulk Carriers and Oil Tankers, 2011 (2011 ESP Code) - Minimum requirements for thickness measurements at renewal surveys of double-hull oil tankers

Background: The 2011 ESP Code, as amended by resolution MSC.461(101), in annex B, part A, annex 2, prescribes the following thickness measurements to be taken at the first Cargo Ship Safety Construction Certificate or Cargo Ship Safety Certificate renewal survey of double-hull oil tankers:

- One section of deck plating for the full beam of the ship within the cargo area;
- Measurements, for general assessment and recording of corrosion patterns, of those structural members subject to close-up survey according to annex 1; and
- Suspect areas.

Amendments to the Code, as amended, have been adopted to require that only “suspect areas” of double-hull oil tankers are subject to thickness measurements during the first Cargo Ship Safety Construction Certificate or Cargo Ship Safety Certificate renewal survey.

Implication: It will be sufficient to consider only suspect areas for thickness measurements at the first Cargo Ship Safety Construction Certificate or Cargo Ship Safety Certificate renewal survey of double-hull oil tankers.

Application: These amendments apply to the first Cargo Ship Safety Construction Certificate or Cargo Ship Safety Certificate renewal surveys taking place on double hull oil tankers of 500GT and above from 1 January 2023.

350

Adopted by
MSC.458(101)

Entry into force
1 January 2024

Amendments to the International Code of Safety for Ships Using Gases or Other Low-Flashpoint Fuels (IGF Code) - (Various – including definitions, probability index fv, loading limit, fuel distribution, internal combustion engines, fire protection)

Background: These amendments are intended to improve the application of the IGF Code by taking account of lessons learned so far. Structural requirements do not need to be applied retrospectively to existing ships.

Implication: Designers and owners constructing ships on or after 1 January 2024 which will use natural gas as fuel (which are not gas carriers) should be aware of the following requirements for such ships:
Where gaseous fuel pipes pass through enclosed spaces (except fully welded fuel gas vent pipes led through mechanically ventilated spaces), they must be protected by a secondary enclosure which may be a ventilated duct or a double wall piping system or other system acceptable to the Administration.
Liquefied fuel pipes must be protected by a secondary enclosure able to contain leakages. However, if the piping system is in a fuel preparation room or a tank connection space, the Administration may waive this requirement. In addition, where required gas detection is not fit for purpose, the

secondary enclosures must be provided with leakage detection by means of pressure or temperature monitoring systems, or any combination, and must be able to withstand the maximum pressure that may build up in the enclosure in case of leakage from the fuel piping.

The exhaust system must be equipped with explosion relief systems unless designed to accommodate the worst case overpressure due to ignited gas leaks or justified by the safety concept of the engine. This requires a detailed evaluation of the potential for unburnt gas in the exhaust system to be undertaken covering the complete system from the cylinders up to the open end.

Fuel storage hold spaces associated with a type C tank can be considered a cofferdam protecting fuel containment systems from machinery spaces provided that the type C tank is not located directly above the machinery space or other rooms of similar fire risk, and the minimum distance to the A-60 boundary from the outer shell of the type C tank or the boundary of the tank connection space is not less than 900mm.

In addition to the above, for all ships using natural gas as fuel which are not gas carriers, irrespective of date of construction: Owners and operators should be aware of the clarification that spaces containing fuel containment systems must be separated from machinery spaces of category A or other rooms with high fire risk with a cofferdam of 900mm with A-60 insulation, and A-60 divisions without use of a cofferdam are not permitted.

Application: These amendments entered into force on 1 January 2024 and are applicable to all cargo ships of 500GT and over and to all passenger ships that use natural gas as fuel (as per SOLAS II-1 Part G) and are subject to the IGF Code, which are not gas carriers.

Most of the amendments apply to ships constructed on or after 1 January 2024 which in this context means:

- ships contracted on or after 1 January 2024; or
- in the absence of a building contract, keel laid on or after 1 July 2024; or
- delivered on or after 1 January 2028.

As indicated in the implications section, one amendment applies irrespective of date of construction.

365

Adopted by
MSC.474(102)

Entry into force
1 January 2024

Class News
No. 15/2023

Amendments to SOLAS regulation II-1/3-8 - Towing and mooring equipment

Background: The IMO recently published new requirements and issued related guidelines on towing and mooring equipment to improve the safety of seafarers during mooring and unmooring operations and to counter the increase of dangerous and sometimes fatal incidents.
These new requirements are incorporated in the amendments to SOLAS Regulation II-1/3-8 contained in Resolution MSC.474(102), later corrected by NV.073, and came into force on 1 January 2024.

Implication: **Shipowners, shipbuilders, designers, and operators** need to consider these regulatory changes and guidelines when finalising any new build designs. Shipowners and operators need to ensure they have the required maintenance plans, procedures and records in place before these changes come into force.
Shipowners (or ship managers) should establish the following onboard maintenance and inspection procedures:

- Procedures for mooring operations, inspection and maintenance of mooring equipment, including mooring lines.

- Procedures to allow the identification and control of mooring lines, tails and associated attachments.
- Periodic inspection of mooring lines, mooring line tails and associated attachments as part of the onboard maintenance plan or equivalent maintenance management system.
- Manufacturers' criteria for replacement of mooring lines should be available.
- Records of the original design concept, equipment, arrangements and specifications should be available on board.

While normally the above are already covered by the onboard Safety Management System, it is highly recommended that companies review their procedures, records and forms to ensure the above items have been properly addressed.

For new construction ships, **designers and shipbuilders** should ensure the supplied documentation provides sufficient information (e.g. technical data, maintenance manuals, mooring rope specification and certificates) to support owners in developing their maintenance and inspection procedures.

Ships constructed before 1 January 2007 were not required to comply with SOLAS, Chapter II-1/ 3-8, so may not have the original design concept to support the development of the new SOLAS maintenance and inspection requirements. In such cases, the following options are available:

- The original design concept could be a mooring arrangement plan or any document that specifies mooring specifications at the time of the ship's construction.
- Alternatively, owners may establish the original design concept, including MBLSD (Ship Design Minimum Breaking Load) for mooring based on the safe working load of mooring equipment provided on board.
- If the vessel neither has any mooring documentation nor any safe working load marking on fittings, owners are advised to check the strength of mooring equipment and their supporting hull structure based on MSC.1/Circ.1175/Rev.1 (or rules applied at the time of construction, such as IACS Recommendation 10). Owners should also determine MBLSD based on actual capacity of the equipment and their supporting hull structure on board. In this case, calculations should be submitted to Lloyd's Register (LR) for appraisal.

Application: The amended regulation II-1/3-8 applies to passenger ships regardless of size and cargo ships of 500GT or over.
The new requirements for existing ships are listed in paragraphs 4 to 6 of this regulation and apply to ships constructed (keel-laid or at a similar stage of construction) on or after 1 January 2007.

The new requirements for new ships are listed in paragraphs 7 and 8 of this regulation and are applicable for ships:

- for which the building contract is placed on or after 1 January 2024; or
- in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 1 July 2024; or
- the delivery of which is on or after 1 January 2027.

New ships (defined in accordance with the above dates), of 3000GT and above, are subject to additional requirements regarding the design of mooring arrangement and mooring line selection, to ensure occupational safety and safe mooring of the ship.

The maintenance and inspection procedures above are required to be confirmed on board at the time of:

- Initial surveys completed on or after 1 January 2024 for new ships;

- First Cargo Ship Safety Construction or Cargo Ship Safety survey (annual, intermediate or renewal), on or after 1 January 2024, for existing ships; or
- Passenger Ship Safety renewal survey, on or after 1 January 2024, for existing ships.

All ships are to have their mooring equipment, including lines, inspected and maintained in a suitable condition for their intended purpose.

Related Instruments

- **MSC.1/Circ.1619 - Guidelines on the design of mooring arrangements and the selection of appropriate mooring equipment and fitting for safe mooring (Design guidelines)**
- **MSC.1/Circ.1620 - Guidelines for inspection and maintenance of mooring equipment including lines (Maintenance guidelines)**
- **MSC.1/Circ.1175 - Guidance on shipboard towing and mooring equipment (applicable to ships constructed on or after 1 January 2007 but before 1 January 2024)**
- **MSC.1/Circ.1175/Rev.1 - Revised Guidance on Shipboard Towing and Mooring Equipment (applicable to ships constructed on or after 1 January 2024)**
- **MSC.1/Circ.1175/Rev.2 - Revised Guidance on Shipboard Towing and Mooring Equipment (applicable to ships constructed on or after 1 January 2028)**
- **MSC.1/Circ.1362/Rev.2 - Unified Interpretation of SOLAS Chapter II-1**

How LR Can Support Clients

On an advisory basis, LR may also support owners carrying out calculations to determine the MBLSD for establishing the original design concept, based on the owner's available information. These calculations are carried out independently of any subsequent plan appraisal.

366

Adopted by
MSC.474(102)

Entry into force
1 January 2024

Amendments to SOLAS Chapter II-1 concerning watertight integrity

Background: The amendments to SOLAS chapter II-1 part B and B-1 (MSC.216(82) and MSC.421(98)) introduced inconsistencies with parts B-1, B-2 and B-4. These arose from the different philosophies behind the probabilistic damage stability assessment and the assumptions made. The probabilistic method does not rely on a single deck (the bulkhead deck) to provide the uppermost watertight boundary, instead the upper boundary of the buoyant volume may be used. In theory this does not need to be a single horizontal surface.

Implication: Amendments to SOLAS Part B-1 and Part B-2, Part B-4 and Part D are summarised below:
Regulation 7-2 – Calculation of the factor si: the changes distinguish between cargo ships' and passenger ships' immersion line and intermediate or final stage of flooding for the calculation of the factor si, and when to take it as zero.

Regulation 12 – Peak and machinery space bulkheads, shaft tunnels, etc.: For passenger and cargo ships constructed on or after 1 January 2024, the collision bulkhead may be pierced below the bulkhead deck of passenger ships and the freeboard deck of cargo ships by not more than one pipe to deal with fluid in the forepeak tank. The pipe is to be fitted with a remotely controlled valve capable of being operated from above the bulkhead deck of passenger ships and the freeboard deck of cargo ships. Additional valve requirements are also introduced.

	Regulation 13 - Openings in watertight bulkheads below the bulkhead deck in passenger ships: Terminology changes where “watertight bulkheads” are replaced by “watertight boundaries” and general updated references. Regulation 15 - Openings in the shell plating below the bulkhead deck of passenger ships and the freeboard deck of cargo ships: For ships for which the building contract was placed on or after 1 January 2020 and constructed before 1 January 2024, gangway, cargo and fuelling ports fitted below the bulkhead deck of passenger ships and the freeboard deck of cargo ships shall be watertight and in no case be so fitted as to have their lowest point below the deepest subdivision draught. For ships constructed on or after 1 January 2024, cargo ports and other similar openings (e.g. gangway and fuelling ports) in the side of ships below the bulkhead deck of passenger ships and the freeboard deck of cargo ships shall be fitted with doors so designed as to ensure the same watertightness and structural integrity as the surrounding shell plating. Unless otherwise granted by the Administration, these openings will need to open outwards. The number of such openings shall be the minimum compatible with the design and proper working of the ship. In no case shall these openings be so fitted as to have their lowest point below the deepest subdivision draught. Regulation 16 – Construction and initial tests of watertight closures: deletion of ash-chutes and rubbish-chutes from paragraph 1.1. Regulation 17 – Internal watertight integrity of passenger ships above the bulkhead deck: *The Guidance notes on the integrity of flooding boundaries above the bulkhead deck of passenger ships for proper application of regulations II-1/8 and 20, paragraph 1, of SOLAS 1974, as amended* (MSC/Circ.541) can be used for passenger ships for which the building contract was placed on or after 1 January 2020 and constructed before 1 January 2024 when applying paragraph 1 of this regulation. For ships constructed on or after 1 January 2024, the internal watertight subdivision arrangements to limit the entry and spread of water above the bulkhead deck shall be in accordance with the design arrangements necessary for compliance with the stability requirements in parts B-1, and B-2 if applicable. Where pipes, scuppers, electric cables, etc. are carried through internal watertight boundaries that are immersed at any intermediate or final stage of flooding in damage cases that contribute to the attained subdivision index A, arrangements shall be made to ensure their watertight integrity. For ships constructed on or after 1 January 2024, doors in internal watertight subdivision arrangements above the bulkhead deck, and also above the worst intermediate or final stage of flooding waterlines, shall be capable of preventing the passage of water when immersed in the required range of positive stability for any damage cases contributing to the attained subdivision index A. These doors may remain open provided they can be remotely closed from the navigation bridge. They shall always be ready to be immediately closed. Regulation 17-1 – Integrity of the hull and superstructure, damage prevention and control on ro-ro passenger ships - All access from the ro-ro deck that leads to spaces below the bulkhead deck shall have a lowest point which is not less than 2.5 m above the bulkhead deck (unless the access is covered by the provisions concerning vehicle ramps and particular accesses to spaces necessary for the essential working of the ship mentioned below). Where vehicle ramps are installed to give access to spaces below the bulkhead deck, their openings shall be able to be closed weathertight to prevent

ingress of water below and fitted with alarms and open/close indicators on the navigation bridge. The means of closure shall be watertight if the deck is intended as a watertight horizontal boundary under regulation 7-2.6.

Subject to SOLAS Part B-4, regulations 23.3 and 23.6, the Administration may permit the fitting of particular accesses to spaces below the bulkhead deck provided they are necessary for the essential working of the ship, e.g. the movement of machinery and stores, and subject to such accesses being made watertight, fitted with alarms and open/close indicators on the navigation bridge.

Various other regulations are updated (regulation 19, 21, 22, 23 and 42) regarding damage control information, inspections of watertight doors and operational considerations around watertightness between cargo spaces before and during voyages.

Application: The amendments apply to cargo ships of 500GT and over and to all passenger ships in various ways depending upon the ship type and construction date, although the amendments are mainly for new ships constructed on or after 1 January 2024 which in this context mean ships:

- for which the building contract is placed on or after 1 January 2024; or
- in the absence of a building contract, the keel of which is laid or which are at a similar stage of construction on or after 1 July 2024; or
- the delivery of which is on or after 1 January 2028.

Related Instruments

- **MSC.429(98)/Rev.2 - Revised explanatory notes to the SOLAS chapter II-1 subdivision and damage stability regulations**
- **MSC.8/Circ.1 -Voluntary early implementation of the amendments to SOLAS regulation II-1/12 adopted by Resolution MSC.474(102)**
- **MSC.1/Circ.1692 - Unified Interpretation of SOLAS Regulation II-1/12.6.2**

374

Adopted by
MSC.482(103)

Entry into force
1 January 2024

Amendments to SOLAS Chapter II-1 to include requirements for water level detectors on multiple hold cargo ships other than bulk carriers and tankers

Background: SOLAS regulation II-1/25 required single hold cargo ships of less than 80 metres (100 metres if constructed before 1 July 1998) to have water level detection alarms. These ships are not required to have a damage stability assessment which means that there is no requirement to assess the effect of flooding of the cargo hold. Should damage occur and water start to enter the hold, there is a need for the crew to be aware of the situation so that appropriate mitigation actions can be taken. It should be noted that the “El Faro” was a multi-hold ship and did not require a water level detection alarm to be fitted. It sank following flooding with loss of life. New SOLAS regulation II-1/25-1 has the intent to include all ships which are currently not required to have a water level detection alarm, with the exception of bulk carriers and tankers.

Implication: Bilge alarms, which are commonly installed on cargo ships that do not carry bulk cargoes, will no longer exclusively fulfil the requirements of the proposed new regulation, and additional water level detectors will be required to do so.
New SOLAS regulation II-1/25-1 deviates from SOLAS II-1/25, in that, the latter is dependent on the ship’s length which is not the case for the new regulation.

Application: Applies to all new cargo ships, except tankers and bulk carriers, with more than one cargo hold which are:

	• contracted on or after 1 January 2024; or • in the absence of a building contract, keel laid on or after 1 July 2024; or • delivered on or after 1 January 2028. **Related Instruments** • **MSC.188(79)/Rev.2 – Revised Performance Standards for Water Level Detectors on Ships subject to SOLAS regulations II-1/25, II-1/25-1 and XII/12** • **MSC.1/Circ.1572/Rev.2 - Unified Interpretations of SOLAS Chapters II-1 and XII, of the Technical Provisions for Means of Access for Inspections (Resolution MSC.158(78)) and of the Performance Standards for Water Level Detectors on Bulk Carriers**
403 Adopted by **MSC.475(102)** Entry into force **1 January 2024**	**Amendments to the International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels (IGF Code) regarding the regulation for fuel preparation room fire-extinguishing systems (Part A-1, Ch.11 - Fire Safety)** **Background:** Potential sources of ignition were identified in fuel preparation rooms. A new requirement is added for fixed fire extinguishing systems in fuel preparation rooms containing pumps, compressors or other potential ignition sources or other potential ignition sources for compliance with the provisions of SOLAS regulation II-2/10.4.1.1, taking into account the necessary concentrations/application rate required for extinguishing gas fires. **Implication:** **Shipyards and Shipowners** will be required to meet these new requirements for fuel preparation rooms containing pumps, compressors or other potential ignition sources. **Application:** This amendment enters into force on 1 January 2024 and is applicable to all cargo ships of 500GT and above and all passenger ships constructed on or after 1 January 2024 that use low-flashpoint fuels (as per SOLAS II-1 Part G) and are subject to the IGF Code. “Ships constructed on or after 1 January 2024” here means: • ships contracted on or after 1 January 2024; or • in the absence of a building contract, keel laid on or after 1 July 2024; or • delivered on or after 1 January 2028. This does not apply to ships using gas as fuel to which the IGC Code applies.

155

Adopted by
SR/CONF/45

Entry into force
26 June 2025

Class News
No. 11/2024
No. 13/2023
No. 17/2025

Hong Kong International Convention on the Safe and Environmentally Sound Recycling of Ships, 2009

Background: It is known that ships may contain environmentally hazardous substances (e.g. asbestos, heavy metals, PBC's) and the recycling of a ship at the end of its life is associated with many working and environmental concerns. As such, the IMO Hong Kong Convention aims to ensure that the recycling of ships does not pose an unnecessary risk to human health, safety or the environment.

The Hong Kong convention has requirements for the design, construction, operation and preparation of ships to facilitate safe and environmentally sound recycling without compromising the safety and operational efficiency of ships; the operation of ship recycling facilities in a safe and environmentally sound manner; and the establishment of an appropriate enforcement mechanism for ship recycling, incorporating certification and reporting requirements.

Implication:

Shipowners:

Will need to ensure that they have a properly regulated method of building, operating and recycling a ship, that safeguards both crew and recycling facility workers safety, whilst minimising the environmental impact.

Key dates:

- From 26 June 2025 new ships* will have to have an approved and certified Inventory of Hazardous Materials (IHM) onboard upon their delivery.
  * "New ships" means a ship:
  - for which the building contract is placed on or after 26 June 2025; or
  - in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 26 December 2025; or
  - the delivery of which is on or after 26 December 2027.
- By 26 June 2030 existing ships will have to have an approved and certified IHM Part I onboard.
- From 26 June 2025 ships going for recycling will have to:
  - be recycled at a ship recycling facility which has a valid Document of Authorisation for Ship Recycling (DASR).
  - hold an approved and valid IHM Parts I, II and III
  - have a ship specific recycling plan, in compliance with the Hong Kong Convention, developed by their chosen ship recycling facility
  - have a ready for recycling certificate onboard.

Ship Recycling Facilities:

By 26 June 2025 - ship recycling facilities will have to have a valid DASR and issue ship specific recycling plans for each ship they plan to recycle.

Manufacturers and Shipbuilders:

Will need to ensure that they complete / compile the required Material Declarations (MD) and Supplier Declarations of Conformity (SDoC) for any items being supplied to the ship which are part of the ships structure or fitted equipment. For shipbuilders they will need to use the MD and SDoC to comply an IHM during the build process.

Application: Applies to all ships over 500GT on international voyages including:

- Submersibles;
- Floating craft;
- Floating platforms;
- Felf elevating platforms;
- Floating Storage Units (FSUs);
- Floating Production Storage and Offloading Units (FPSOs); and
- A vessel stripped of equipment or being towed.

Exceptions; Warships, naval auxiliary, ships used for government non-commercial service.
Also applies to ship recycling facilities operating in a country which has adopted the Hong Kong Convention.

Further Information

Inventory of Hazardous Materials

LR offers **Ship recycling advisory services| LR** to ensure compliant and safe ship recycling with our verification and assessment services against international standards.

Related Instruments

- **MEPC.196(62) - 2011 Guidelines for the Development of the Ship Recycling Plan**
- **MEPC.210(63) - 2012 Guidelines for Safe and Environmentally Sound Ship Recycling**
- **MEPC.211(63) - 2012 Guidelines for the Authorization of Ship Recycling Facilities**
- **MEPC.222(64) - 2012 Guidelines for the survey and certification of ships under the Hong Kong Convention**
- **MEPC.379(80) as amended by MEPC.405(83) – 2023 Guidelines for the development of the Inventory of the Hazardous Materials**

How LR Can Support Clients

IHM Services

Our well established IHM service offers reputable and consistent global service delivery, helping to promote better hazard management and sustainable ship recycling. Since 2004, thousands of ships spanning both new construction and in service have entrusted LR to provide inventory certification services. LR offers end-to-end IHM services to both LR and non-LR classed ships. We provide an intuitive and competitively priced approval, verification, and certification service to ensure compliance with EU and HKC legislation – for both newbuilds and existing ships.

Our simple, tried and tested IHM template is carefully designed against legislative requirements and allows easy compilation and maintenance of the IHM.

We have a list of independently LR approved companies who can provide you with expert IHM compilation and hazardous materials sampling/testing services against legislative requirements. To date we have checked and approved the procedures and operations of around 40 Hazardous Material expert companies.

Final Survey services

We can apply our expertise to support you with compliance with Final Survey in accordance with the Hong Kong Convention

End of life services

Our bespoke advisory and certification services have been provided for many sensitive ship recycling projects. We work with shipowners/operators and ship recycling facilities:

For shipowners: our unique Audit During Recycling service helps to provide assurance that national and international standards are met, including the downstream handling of hazardous waste. We can help you follow best practice, attain independent assurance that agreed standards are upheld and regulatory requirements have been met, thereby minimising potential liabilities and adverse publicity at the end of your ship's life.

For ship recycling facilities: we can apply our expertise to support you in your HKC compliance journey. As part of our Ship Recycling services we want to help you stand out from the crowd and help you to give your clients full confidence that end of life ships are being recycled in compliance in a safe and environmentally sound manner.

188264

Adopted by **MEPC.203(62)** **(MEPC.203(62)** has been further amended by **MEPC.251(66)**, **MEPC.301(72)** and **MEPC.324(75)** all of which have been consolidated by **MEPC.328(76))**

Entry into force **1 January 2013**

Amendments to Chapter 4 of MARPOL Annex VI: Regulation 24 – Phase 2 Implementation of Energy Efficiency Design Index (EEDI)

Background: EEDI requirements were adopted within MARPOL Annex VI to promote more efficient new ships to reduce CO_2 emissions. EEDI implementation has a phased increase in the value of reduction factors from the reference value defined in MARPOL Annex VI, Regulation 24.3. EEDI reflects the amount of CO_2 generated per tonne-mile (cargo carrying capacity). It provides a uniform approach to calculating a ship's energy efficiency during its design and construction and it promotes efficient ship design.
Table - Shows the reduction factor as a percentage for the Required EEDI compared to the EEDI Reference line for Phase 2 implementation. The Phase 2 (Tranche 1 & 2) requirements were effective from 1 January 2020 for the listed ship types and sizes. The Table also shows those ship types whose Phase 2 (Tranche 1) implementation ended on 31 March 2022. Note that additional amendments to EEDI for Phase 3 (Tranche 1 & 2) implementation of the listed ship types have been adopted by Resolution MEPC.324(75). The Phase 3 (Tranche 1) requirements were effective from 1 April 2022, while Phase 3 (Tranche 2) requirements will be effective from 1 January 2025 and further details of Phase 3 implementation can be found in item 373.

Ship Type	Size	Phase 2 (Tranche 1) 1-Jan-20 – 31-Mar-22	Phase 2 (Tranche 2) 1-Jan-20 – 31-Dec-24
Bulk carrier	20,000 DWT and above		20
	10,000 and above but less than 20,000 DWT		0-20*
	15,000 DWT and above	20	

Gas carrier	10,000 and above but less than 15,000 DWT		20
	2,000 and above but less than 10,000 DWT		0-20*
Tanker	20,000 DWT and above		20
	4,000 and above but less than 20,000 DWT		0-20*
Container ship	200,000 DWT and above	20	
	120,000 – 200,000 DWT	20	
	80,000 – 120,000 DWT	20	
	40,000 – 80,000 DWT	20	
	15,000 – 40,000 DWT	20	
	10,000 – 15,000 DWT	0-20*	
General Cargo ships	15,000 DWT and above	15	
	3,000 – 15,000 DWT	0-15*	
Refrigerated cargo carrier	5,000 DWT and above		15
	3,000 DWT and above but less than 5,000 DWT		0-15*
Combination carrier	20,000 DWT and above		20
	4,000 DWT and above but less than 20,000 DWT		0-20*
Ro-ro cargo ship (vehicle carrier)**	10,000 DWT and above		15
LNG Carrier**	10,000 DWT and above	20	
Ro-ro cargo ship**	2,000 DWT and above		20
	1,000 DWT and above but less than 2,000 DWT		0-20*
Ro-ro passenger ship**	1000 DWT and above		20
	250 DWT and above but less than 1,000 DWT		0-20*
Cruise passenger ship** having non-conventional propulsion	85,000 GT and above	20	
	25,000 – 85,000 GT	0-20*	

* Reduction factor to be linearly interpolated between the two values dependant upon ship size. The lower value of the reduction factor is to be applied to the smaller ship size.

** Reduction factor applies to those ships delivered on or after 1 September 2019, as defined in paragraph 2.1 of regulation 2.

Implication: **Shipbuilders and Designers:** Ships will need to be designed and constructed to reduce CO_2 emissions. There are several ways to achieve this which include:

- Increase ship size: engine power ratio
- Reduce lightship weight

- Innovative solutions (e.g. air bubble – friction reduction)
- Optimise propeller efficiency
- Hydrodynamics improvement
- Speed reduction
- Use of renewable power source (e.g. wind, solar power)
- Low carbon fuels (e.g. LNG)
- Energy saving devices (e.g. WHR, shaft generators)

Shipowners and Ship Managers: There are several technical and operational measures that can be considered to reduce GHG emissions. Any EEDI assessments carried out by designers in the initial and final design stages for above mentioned new ships are to adopt the latest reduction factor requirements as per the table above.
Owners/Managers considering a major conversion of an existing ship will need to assess if the ship will be considered as a new ship following conversion.

Application: Bulk Carriers, Combination Carriers, Containerships, Cruise Passenger Ships with non-conventional propulsion, Gas Carriers, General Cargo Ships, LNG Carriers, Ro-ro Cargo Ships, Ro-ro Cargo (vehicle carrier) Ships, Ro-ro Passenger Ships, Refrigerated Cargo Carriers and Tankers all of which are new ships, new ships which undergo major conversion or are new or existing ships which undergo major conversion that is so extensive that the ship is regarded by the Administration as a newly-constructed ship.
According to UIs in MEPC.1/Circ.795/Rev.9, for the purpose of EEDI application, a new ship is a ship:

- For ship types where Phase 2 ends on 31 March 2022:
  .1 the building contract of which is placed in Phase 2, and the delivery is before 1 April 2026; or
  .2 the building contract of which is placed before Phase 2, and the delivery is on or after 1 January 2024 and before 1 April 2026; or
  in the absence of a building contract:
  .3 the keel of which is laid or which is at a similar stage of construction on or after 1 July 2020 and before 1 October 2022, and the delivery is before 1 April 2026; or
  .4 the keel of which is laid or which is at a similar stage of construction before 1 July 2020, and the delivery is on or after 1 January 2024 and before 1 April 2026.
- For ship types where Phase 2 ends on 31 December 2024:
  .1 the building contract of which is placed in Phase 2, and the delivery is before 1 January 2029; or
  .2 the building contract of which is placed before Phase 2, and the delivery is on or after 1 January 2024 and before 1 January 2029; or
  in the absence of a building contract:
  .3 the keel of which is laid or which is at a similar stage of construction on or after 1 July 2020 and before 1 July 2025, and the delivery is before 1 January 2029; or
  .4 the keel of which is laid or which is at a similar stage of construction before 1 July 2020, and the delivery is on or after 1 January 2024 and before 1 January 2029.

A major conversion means a conversion of a ship:

- which substantially alters the dimensions, carrying capacity or engine power of the ship;

	• which changes the type of the ship; • the intent of which in the opinion of the Administration is substantially to prolong the life of the ship; • which otherwise so alters the ship that, if it were a new ship, it would become subject to relevant provisions of the present Convention not applicable to it as an existing ship; or • which substantially alters the energy efficiency of the ship and includes any modifications that could cause the ship to exceed the applicable required EEDI or the applicable required EEXI. **Related Instruments** • **MEPC.1/Circ.850/Rev.3 - Guidelines for determining minimum propulsion power to maintain the manoeuvrability of ships in adverse conditions.** • **MEPC.231(65) – 2013 Guidelines for calculation of reference lines for use with the Energy Efficiency Design Index (EEDI).** • **MEPC.233(65) – 2013 Guidelines for calculation of reference lines for use with the Energy Efficiency Design Index (EEDI) for cruise passenger ships having non-conventional propulsion.** • **MEPC.364(79) - 2022 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships.** • **MEPC.365(79) - 2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI), as amended by MEPC.374(80) and MEPC.403(83).** • **MEPC.1/Circ.855/Rev.3 - 2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI)** • **MEPC.1/Circ.896 - 2021 Guidance on treatment of innovative energy efficiency technologies for calculation and verification of the attained EEDI and EEXI.** • **MEPC.1/Circ.795/Rev.9 - Unified Interpretations to MARPOL Annex VI.**

Part 2

Adopted IMO and ILO requirements entering into force in the future

This part includes requirements that have been adopted and have an entry into force date which has been established by the IMO or ILO but has not yet reached that date. It also covers requirements that have been adopted but have no certain entry into force date because the conditions for ratification have not been met.

379

Adopted by
MSC.554(108)

Entry into force
1 January 2026

Amendments to the LSA Code - single fall and hook systems with on-load release capability

Background: Lifeboats and rescue boats with single fall and hook systems face a similar risk of potential accidental release during recovery operations as those with twin fall and hook systems. As these systems are used and tested in a similar way as twin fall lifeboats, they should have similar safety standards. Having discussed the issue, the IMO has now adopted amendments to paragraphs 4.4.7.6.8 and 4.4.7.6.17 of the LSA Code in order to ensure adequate safety standards for lifeboats and rescue boats fitted with single fall and hook systems.

Implication: **Life-saving appliance manufacturers:** Requirements are updated for all new installations of lifeboats and rescue boats with a single fall and hook system. The amendments require that:
(4.4.7.6.8) to prevent accidental release during recovery of the boat, the hook shall not be able to support any load unless the hook is completely reset. In the case of a hook which is capable of releasing the lifeboat or rescue boat with a load on the hook when it is not fully waterborne, the handle or safety pins shall not be able to be returned to the reset (closed) position, and any indicators shall not indicate the release mechanism is reset, unless the hook is completely reset. Additional danger signs shall be posted at each hook station to alert crew members to the proper method of resetting; and
(4.4.7.6.17) where a single hook and fall system is used for launching a lifeboat or rescue boat in combination with a suitable painter, the requirements of 4.4.7.6.7 and 4.4.7.6.15 need not be applicable provided that the single fall and hook system does not have the capability to release the lifeboat or rescue boat with a load on the hook when it is not fully waterborne.

Shipyards and Owners: To be aware of the need to comply with the new requirements.

Application: The amendments will enter into force on 1 January 2026. They will apply to lifeboats and rescue boats installed on cargo ships of 500GT and over and passenger ships on or after 1 January 2026, where a single fall and hook system is used for launching them.
The expression "installed on or after 1 January 2026" means:

(a) for ships for which the building contract is placed on or after 1 January 2026, or in the absence of the contract, the keels of which are laid or which are at a similar stage of construction on or after 1 January 2026, all installations of lifeboats or rescue boats with a single fall and hook system on board those ships; or

(b) for ships other than those ships specified in (a) above, all installations of lifeboats or rescue boats with a single fall and hook system, having a contractual delivery date for the equipment to the ship on or after 1 January 2026 or, in the absence of a contractual delivery date to the ship, actually delivered to the ship on or after 1 January 2026.

383

Adopted by
MSC.532(107)

New SOLAS II-1, Regulation 3-13 (lifting appliances and anchor handling winches)

Background: The IMO has developed new mandatory requirements to cover lifting appliances and anchor handling winches. These consist of amendments to SOLAS and supporting guidelines.

Implication: Lifting appliances that are installed on or after 1 January 2026 will need to:

- Be designed, constructed and installed in accordance with the requirements of a classification society recognised by the Administration.

Entry into force **1 January 2026** Class News No. 12/2025	• Load tested and thoroughly examined after installation and before being taken into use for the first time and after repairs, modifications or alterations. • Be permanently marked with, and provided with documentary evidence for, the safe working load (SWL). Lifting appliances that are installed before 1 January 2026 will need to: • Be tested and thoroughly examined, based on MSC.1/Circ.1663 *Guidelines for Lifting Appliances* and be permanently marked with, and provided with documentary evidence for, the safe working load (SWL) no later than the date of the first Passenger Ship Safety Certificate, Cargo Ship Safety Certificate or Cargo Ship safety Construction Certificate renewal survey on or after 1 January 2026. Anchor handling winches installed on or after 1 January 2026 shall be designed, constructed, installed and tested to the satisfaction of the Administration, based on MSC.1/Circ.1662 *Guidelines for Anchor Handling Winches*. Anchor handling winches installed before 1 January 2026 shall be tested and thoroughly examined, based on MSC.1/Circ.1662 *Guidelines for Anchor Handling Winches* no later than the date of the first Passenger Ship Safety Certificate, Cargo Ship Safety Certificate or Cargo Ship Safety Construction Certificate renewal survey on or after 1 January 2026. * The expression “installed on or after 1 January 2026” means: .1 for ships the keel of which is laid or which is at a similar stage of construction on or after 1 January 2026, any installation date on the ship; or .2 for ships other than those specified in .1, including those constructed before 1 January 2009, a contractual delivery date for lifting appliance or anchor handling winches, or in the absence of a contractual delivery date, the actual delivery date of the lifting appliance or anchor handling winches to the ship on or after 1 January 2026. All lifting appliances and anchor handling winches, regardless of installation date, and all loose gear utilised with any lifting appliances and anchor handling winches, are to be operationally tested, thoroughly examined, inspected, operated and maintained, based on the Guidelines developed by the IMO (MSC.1/Circ.1662 and MSC.1/Circ.1663). **Application:** This regulation applies to all lifting appliances, anchor handling winches and loose gear which have a SWL of 1000kg and above. For those lifting appliances with a lower SWL, the Administration is to determine to what extent the lifting appliance should comply with the regulation. This regulation does not apply to: • Lifting appliances on ships certified as MODUs; • Lifting appliances used on offshore construction ships (pipe/cable laying/repair or offshore installation vessels, including ships for decommissioning work); • Integrated mechanical equipment for opening and closing hold hatch covers; and • Life-saving launching appliances complying with the International Life-Saving Appliance (LSA) Code. **Related Instruments** • **MSC.1/Circ.1663 - Guidelines for Lifting Appliances** • **MSC.1/Circ.1662 - Guidelines for Anchor Handling Winches** • **MSC.1/Circ.1696 - Unified Interpretation of SOLAS Regulation II-1/3-13.2.4**

395

Adopted by
MSC.535(107)

Entry into force
1 January 2026

Amendments to the International Life-Saving Appliance (LSA) Code - Ventilation of totally enclosed lifeboats

Background: The report of the investigation into the sinking of the *MOL Comfort* in the Indian Ocean refers to the discomfort experienced by many crew members in totally enclosed lifeboats. It recommended that further investigation into the issue of the ventilation of totally enclosed lifeboats should be carried out with a view to improving the thermal loading of occupants in emergency situations.

Implication: Totally enclosed lifeboats will need to be designed and fitted with a means of ventilation to achieve a ventilation rate of at least $5m^3/h$ per person for the number of persons the lifeboat is permitted to accommodate and for a period of not less than 24 hours.

Application: This applies to all totally enclosed lifeboats installed on ships on or after 1 January 2029*.

*The expression "installed on or after 1 January 2029" means:

(a) for ships for which the building contract is placed on or after 1 January 2029, or in the absence of the contract, constructed on or after 1 January 2029, any installation date on the ship; or

(b) for ships other than those ships described in (a) above, a contractual delivery date for the equipment to the ship on or after 1 January 2029 or, in the absence of a contractual delivery date, the actual delivery date of the equipment to the ship on or after 1 January 2029.

Related Instruments

- **MSC.544(107)- Amendments to the Revised recommendation on testing of life-saving appliances (Resolution MSC.81(70))**

406

Adopted by
MSC.554(108)

Entry into force
1 January 2026

Amendments to the LSA Code to address the in-water performance of SOLAS adult lifejackets.

Background: After the deaths of three seafarers whilst wearing SOLAS lifejackets in favourable environmental conditions, the subsequent enquiries have shown that the current requirements for the design and testing of SOLAS lifejackets do not provide consistent assurance of their in-water performance.

Implication:

Equipment manufacturers: Minimum performance standards for SOLAS adult life jackets will be enhanced, necessitating potential modifications to life jacket designs to align with the updated standards. The amendments ensure that the lifejacket is designed and tested to turn the body of an unconscious person to a face-up position where the nose and mouth are both clear of the water. Lifejackets meeting the new standards will need to be tested and approved as such in advance of 1 January 2026.

Shipowners/operators and shipyards: When replacing lifejackets on existing ships or sourcing lifejackets for new ships, it should be noted that the lifejackets will need to meet the new performance standards and be approved accordingly.

Application: This will apply to new SOLAS adult lifejackets carried onboard cargo ships of 500GT and over and all passenger ships from 1 January 2026.

The new requirements are applicable to new ships for which a building contract is in place or in the absence of a contract, the keel is laid or is at similar stage of construction on or after 1 January 2026. For existing ships, this will be applicable for all adult lifejackets with contractual delivery date or actual delivery date to the ship on or after 1 January 2026.

Related Instruments

- **MSC.563(108)-Amendments to the Revised Recommendation on Testing of Life-Saving Appliances (Resolution MSC.81(70))**

409

Adopted by
MSC.550(108)

Entry into force
1 January 2026

Amendments to SOLAS Chapter II-2/20 - Fire safety on ships fitted with vehicle, special category, open and closed ro-ro spaces and weather decks intended for the carriage of vehicles

Background: The IMO has reviewed SOLAS chapter II-2 and associated codes regarding vehicle, special category, ro-ro spaces and weather decks of new and existing ro-ro ships based on the findings of the FIRESAFE II study. It should be noted that the IMO issued *the Interim guidelines for minimising the incidence and consequences of fires in ro-ro spaces and special category spaces of new and existing ro-ro passenger ships* (MSC.1/Circ.1615), pending changes to SOLAS, to address the risks related to ro-ro passenger ships.

The amendments to SOLAS chapter II-2/20 for ships fitted with vehicle, special category, open and closed ro-ro spaces and weather decks intended for the carriage of vehicles include, but are not limited to;

- Individually identifiable smoke and heat detector systems, (including linear heat detectors), for open and closed vehicle ro-ro spaces.
- Fire detection and alarm system requirements for weather decks intended for the carriage of vehicles, including a safety distance from vehicle lanes to accommodation spaces, control stations and normally occupied service spaces.
- Video monitoring on vehicle spaces, open and closed ro-ro spaces and special category spaces.
- Fixed water-based fire-extinguishing systems to protect weather decks primarily using water monitor(s), with nozzles being acceptable for areas which monitors cannot cover. Detailed specifications for nozzles are also included as well as water supply capacity.
- Changes to structural fire protection of ro-ro and special category spaces including the protection from openings which is extended to include access to embarkation and assembly stations, as well as intakes for machinery.
- Openings in ro-ro spaces provided with closing devices such as steel A-class ramps and steel A-class doors should be permitted below survival craft and accommodation spaces (including normally occupied service spaces and control stations).
- Openings in ro-ro spaces below accommodation spaces, control stations and normally occupied service spaces are permitted when the fire integrity of the ship's side, including windows and doors, is A-60 within a specified rectangular area (A-0 windows protected by a water-based system may be accepted as equivalent to A-60 windows).

Implication: **Shipyards, equipment manufacturers and shipowners**: Equipment installation requirements are updated for both new and existing ships fitted with vehicle, special category, open and closed ro-ro spaces and weather decks intended for the carriage of vehicles. The new requirements will need to be complied with.

Application: The amendments to SOLAS chapter II-2/20 apply to ships constructed* on or after 1 January 2026, fitted with vehicle, special category, open and closed ro-ro spaces and weather decks intended for the carriage of vehicles.
** The expression "ships constructed" means ships the keels of which are laid or which are at a similar stage of construction as defined in SOLAS chapter II-2/1.*

Ships constructed before 1 January 2026, including those constructed before 1 July 2012, shall also comply with regulations adopted by resolution MSC.550(108), as follows:

- SOLAS II-2/20.4.1.6 regarding requirements for a fixed fire detection and fire alarm system complying with the FSS Code: passenger ships constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply not later than the first survey on or after 1 January 2028;
- The requirements of SOLAS II-2/20 paragraphs 4.1.1 to 4.1.4 regarding requirements for a fixed fire detection and fire alarm system complying with the FSS Code shall only apply to passenger ships constructed on or after 1 January 2026. Passenger ships constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the requirements of paragraph 4.1.6 and the previously applicable requirements of paragraph 4.1 (Fixed Fire Detection and Alarm Systems).
- The requirements of SOLAS II-2/20.4.1.5 regarding requirements for a fixed fire detection and fire alarm system complying with the FSS Code shall apply to cargo ships constructed on or after 1 January 2026. Cargo ships constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the previously applicable requirements of paragraph 4.1 (Fixed Fire Detection and Alarm Systems);
- SOLAS II-2/20.4.4 regarding video monitoring: The requirements of paragraphs 4.4.1 and 4.4.2 apply to ships constructed on or after 1 January 2026. Passenger ships with vehicle, special category or ro-ro spaces constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the requirements of paragraphs 4.4.1 and 4.4.2 not later than the first survey on or after 1 January 2028;
- SOLAS II-2/20.5 regarding structural fire protection and arrangement of openings: Applies to passenger ships constructed on or after 1 January 2026. Passenger ships constructed before 1 January 2026 shall comply with the previously applicable requirements of paragraph 5; and
- SOLAS II-2/20.6 regarding fire extinction: The requirements of paragraphs 6.2.1 and 6.2.2 regarding fixed water-based fire-extinguishing system on weather decks intended for carriage of vehicles shall apply to ro-ro passenger ships constructed on or after 1 January 2026. Passenger ships with vehicle, special category or ro-ro spaces constructed before 1 January 2026, including those constructed before 1 July 2012, shall comply with the requirements of paragraph 6.2.3 regarding fixed water-based fire-extinguishing system based on monitors not later than the first survey on or after 1 January 2028.

Related Instruments

- **MSC.555(108) – Amendments to the FSS Code**

412

Adopted by
MSC.550(108)

Amendments to SOLAS Regulation II-2/7.5.5 - Fire protection of control stations and cargo control rooms on new cargo ships

Background: The IMO adopted amendments to SOLAS regulation II-2/7.5.5 and approved consequential amendments to MSC.1/Circ.1456 with respect to the protection of accommodation and service spaces and control stations where a fixed fire detection and alarm system is required. The

Entry into force **1 January 2026**	following text is added to the protection methods in paragraphs 5.5.1, 5.5.2 and 5.5.3: "and in all control stations and cargo control rooms". The revised circular was published as MSC.1/Circ.1456/Rev.1 which supersedes MSC.1/Circ.1456 and MSC.1/Circ.1492. **Implication:** **Shipyards and shipowners** will need to comply with the amended SOLAS requirements for protection of accommodation and service spaces and control stations where a fixed fire detection and alarm system is required. As a result, control stations and cargo control rooms on new ships will have to comply with the protection method selected. **Application:** The amendments to SOLAS chapter II-2/7.5.5 apply to all new cargo ships of 500GT and over with keels laid or at a similar stage of construction on or after 1 January 2026. The expression a "similar stage of construction" means the stage at which: .1 construction identifiable with a specific ship begins; and .2 assembly of that ship has commenced comprising at least 50 tonnes or 1% of the estimated mass of all structural material, whichever is less. Ships constructed before 1 January 2026 will need to comply with the current requirements of paragraph 5.5. **Related Instruments** • **MSC.1/Circ.1456/Rev.1 - Unified Interpretations of SOLAS Chapter II-2 and the FSS and FTP Codes**
413 Adopted by **MSC.532(107)** Entry into force **1 January 2026** Class News **No. 16/2025**	**Amendments to SOLAS chapter II-2 – Provisions to prohibit the use of fire-fighting foams containing PFOS** **Background:** The IMO developed amendments to SOLAS chapter II-2 and consequential amendments to other instruments to prohibit the use of fire-fighting foams containing perfluorooctane sulfonic acid (PFOS) due to its toxic nature. The prohibition applies to both fixed and portable systems as the intent is to prohibit the use of all extinguishing media containing PFOS that can be used in fire extinguishing systems and equipment. Amendments are also applied to the 1994 (MSC.536(107)) and 2000 (MSC.537(107)) HSC Codes. **Implication:** Fire fighting foams containing PFOS will be banned, and any substances containing PFOS will need to go to appropriate shore reception facilities. **Equipment manufacturers**: are to take note and change the chemical make up of extinguishing media. **Shipowners and Ship operators**: are to comply with carriage ban and remove the PFOS containing extinguishing media from ships to reception facilities ashore. **Application:** Applies to new and existing ships not later than the date of the first initial, annual, periodical or renewal survey (for passenger ship safety certificate, cargo ship safety equipment certificate, cargo ship safety certificate and high speed craft safety certificate), whichever occurs first, after the date of entry into force. Enters into force 1 January 2026. **Related Instruments** • **MSC.536(107) - Amendments to the International Code of Safety for High-Speed Craft, 1994 (1994 HSC Code) Chapter 7** • **MSC.537(107) - Amendments to the International Code of Safety for High-Speed Craft, 2000 (2000 HSC Code) Chapter 7**

	• **MSC.1/Circ.1694 - Unified interpretations of SOLAS chapter II-2, and the 1994 and 2000 HSC Codes**
431 Adopted by **MSC.551(108)** Entry into force **1 January 2026**	**Amendments to the IGF Code - 2026** **Background:** The IGF Code is reviewed regularly. These amendments incorporate a number of consolidations and additional new provisions based on the industry's gained experience. **Implication:** The amendments are (but not limited to): • Part A-1 • 4.2.2 - Necessary reference addition based on the proposed change to 8.4.2 listed below. • 5.12.1 - For ships constructed on or after 1 January 2026, clarification as to whether the requirement for “door sill” applies to the outer door (i.e. the door leading to the hazardous area). • 6.7.3.1.1 - For ships constructed on or after 1 January 2026, the proposed changes are to improve the design requirements for the pressure relief system of the LNG fuel tanks, ensuring that the pressure relief system is of sufficient capacity when implementing the isolation requirements specified in paragraph 6.7.2.6 and that fuel tanks shall not be bunkered until the full relieving capacity is restored. • 6.9.1.1 - For ships constructed on or after 1 January 2026, new changes to permit utilisation of more than one method in order to control the tank pressure and temperature, e.g. by one of the following methods: .1 reliquefaction of vapours; .2 thermal oxidation of vapours; .3 pressure accumulation; or. .4 liquefied gas fuel cooling. • 7.3.2.1 - For ships constructed on or after 1 January 2026, the formula to calculate the thickness of the piping has been amended to make it clearer. • 8.4.1 to 8.4.3 - Changes aimed at addressing the leaks during bunkering operations at the connection between the bunker system and the bunkering manifold and aligning the IGF Code to ISO standard 21593:2019 and ISO 20519:2021. This change is available for early implementation (subject to the flag Administration’s approval). • 9.3.1 - For ships constructed on or after 1 January 2026, fuel supply systems require redundancy and segregation so a leak or failure in one system doesn't result in an unacceptable loss of power. If there is leakage or failure, Administrations may accept partial reduction in propulsion capacity from normal. • 9.4.7 - For ships constructed on or after 1 January 2026, automatic ventilation of the gas supply pipe between the master valve and the double block and bleed valves is required, and between the double block and bleed valves and the consumer, when the master gas fuel valve is automatically shut down. • 9.4.8 - For ships constructed on or after 1 January 2026, “engine” will be replaced by “gas consumer”. • 9.6 - The amendment now specifies that the fuel piping referenced is “Gas” fuel piping.9.6.1 - Sub-paragraph 1 includes a requirement for purging high pressure systems when the master gas valve is closed. This requirement is not included for low pressure systems. As there is no justification for having the difference, this was deleted.

- 9.8.1, 9.8.2, 9.8.4 - Changes in determining design pressure of pipes and ducts. Applicable to ships constructed on or after 1 January 2026.
- 11.3.1 - The fuel preparation room shall, for the purpose of the application of SOLAS regulation II-2/9, be regarded as a machinery space of category A. Applicable to ships constructed on or after 1 January 2026.
- 11.6.2 - A 5kg portable dry powder fire extinguisher is to be located in the fuel preparation room. For ships constructed before 1 January 2026, this shall be provided not later than the first survey on or after 1 January 2026.
- 12.5.1 - Interbarrier spaces are now considered Hazardous area zone 0. Applicable to ships constructed on or after 1 January 2026.
- 12.5.2.1 - Interbarrier spaces are removed from Hazardous area zone 1. Applicable to ships constructed on or after 1 January 2026.
- 15.4.1.3 - Since the requirements for the liquid level gauging in the IGF Code should be more in line with the IGC Code, additionally to 15.4.1.3.1 and 15.4.1.3.2, liquefied gas fuel tank liquid level gauges may also be closed devices which penetrate the liquefied gas fuel tank, but which form part of a closed system and keep the gas fuel from being released. Such devices shall be considered as tank connections. A shut off valve, located as close as possible to the tank, should be provided if the closed gauging device is not mounted directly onto the tank.
- 18.4.1.1.1 - Introduction of "*compatibility of maximum possible delivery pressure and vessel's bunkering line design pressure*" as an additional item to agree in writing before any bunkering operation commences.

Application: The application of the amendments are included under each item. In general, they will apply to ships constructed on or after 1 January 2026 which use low-flashpoint fuel, other than ships covered by the IGC Code. Otherwise they apply to both new and existing ships using low-flashpoint fuel.

Ships constructed on or after 1 January 2026 mean those:
- for which the building contract is placed on or after 1 January 2026;
- in the absence of a building contract, the keels of which are laid or which are at a similar stage of construction on or after 1 July 2026; or
- the delivery of which is on or after 1 January 2030.

445

Adopted by
MSC.523(106)

Entry into force
1 January 2026

Amendments to the IGC Code - High manganese austenitic steel

Background: Following the adoption of MSC.475(102) & MSC.476(102), high manganese austenitic steel is now introduced in the IGC code (Table 6.3 of chapter 6).

Implication: High manganese austenitic steel can now be used – subject to the required conditions specified in MSC.1/Circ.1599/Rev.3 – for the manufacturing of plates, sections and forgings for cargo tanks, secondary barriers and process pressure vessels on ships that comply with the IGC Code.

Application: The amendments apply from 1 January 2026 to ships regardless of their size, including those of less than 500GT, engaged in the carriage of liquefied gases having a vapour pressure exceeding 0.28 MPa absolute at a temperature of 37.8°C and other products, as shown in IGC Code Chapter 19 - Summary of minimum requirements, when carried in bulk.

	Related Instruments • **MSC.1/Circ.1599/Rev.3 - Revised guidelines on the application of high manganese austenitic steel for cryogenic service**
446 Adopted by **MSC.524(106)** Entry into force **1 January 2026**	**Amendments to the IGF Code - High manganese austenitic steel** **Background:** Following the adoption of MSC.475(102) & MSC.476(102), high manganese austenitic steel is now introduced in the IGF code (Table 7.3 of chapter 7) as a new material for construction. **Implication:** High manganese austenitic steel can now be used – subject to the required conditions specified in MSC.1/Circ.1599/Rev.3 – for the manufacturing of plates, sections and forgings for fuel tanks, secondary barriers and process pressure vessels on ships that comply with the IGF Code. **Application:** The amendments apply from 1 January 2026 to ships which use low-flashpoint fuel, other than ships covered by the IGC Code. **Related Instruments** • **MSC.1/Circ.1599/Rev.3 - Revised guidelines on the application of high manganese austenitic steel for cryogenic service**
449 Adopted by **MSC.520(106)** Entry into force **1 January 2026**	**Amendments to SOLAS Chapter II-2 on the reporting of confirmed cases where oil fuel suppliers have failed to meet the flashpoint requirements specified in SOLAS regulation II-2/4.2.1** **Background:** The IMO has agreed that the Marine Safety Committee should take a more robust stance on the safety issues related to fuel oil characteristics and incorporate amendments into SOLAS to address these concerns. The SOLAS amendments to Chapter II-2 regulation 4.2.1 have been developed to incorporate the safety requirements for fuel. The proposed amendments to the "Definitions" in Chapter II-2 Regulation 3 do not include reference to the operational processes relating to acceptance of a sample analysis report by the Administration. **Implication:** **Oil fuel suppliers**: will have to update Bunker Delivery Notes (BDNs) in accordance with the amended requirements of SOLAS Ch II-2/4.2.1. **Ship operators**: should be aware of the requirements placed on oil fuel suppliers to supply BDNs in accordance with the amended requirements of SOLAS Ch II-2/4.2.1. **Contracting Governments**: should be aware of the requirements placed on them, or their designated authorities, to inform the relevant organisations and take action, as appropriate, against oil fuel suppliers that have been found to deliver oil fuel that does not comply with the amended requirements of SOLAS Ch II-2/4.2.1.

	Application: The SOLAS amendments will enter into force on 1 January 2026 and apply to all ships using oil fuel which are subject to SOLAS, regardless of the date of construction.
487 Adopted by **MSC.532(107)** **MSC.538(107)** Entry into force **1 January 2026**	**Amendments to SOLAS chapter XIV and Related Amendments to the Polar Code** **Background:** After reviewing the technical analysis of the feasibility and consequences of applying chapters 9 and 11 of the Polar Code to non-SOLAS ships, the IMO has published amendments to SOLAS Chapter XIV together with amendments to the Polar Code. MSC.532(107) amends regulation 2 of SOLAS Chapter XIV (Application) to include non-SOLAS ships and MSC.538(107) adds new chapters 9-1 (Safety of Navigation for Non-SOLAS ships) and 11-1 (Voyage Planning for Non-SOLAS ships) to the Polar Code. **Implication:** Designers, builders, equipment manufacturers, owners and operators of fishing vessels, pleasure yachts and cargo ships with the applicable length or GT operating in polar waters will need to take note of, and comply with, the new requirements from chapters 9-1 (Safety of Navigation for Non-SOLAS ships) and 11-1 (Voyage Planning for Non-SOLAS ships). **Application:** The amendments to SOLAS Ch XIV will apply to all ships as well as: • Fishing vessels of 24 metres of length overall and above; • Pleasure yachts of 300GT and over not engaged in trade; and • Cargo ships of 300GT and over but below 500GT Fishing vessels, pleasure yachts and cargo ships, as defined above, which are constructed before 1 January 2026, are to meet the relevant requirements of chapters 9-1 and 11-1 in part I-A of the Polar Code by 1 January 2027. Fishing vessels, pleasure yachts and cargo ships, as defined above, constructed on or after 1 January 2026, are to meet the relevant requirements of chapters 9-1 and 11-1 in part I-A of the Polar Code from 1 January 2026 For the purpose of this requirement, "constructed" means a ship the keel of which is laid or which is at a similar stage of construction. At a similar stage of construction means the stage at which: • construction identifiable with a specific ship begins; and • assembly of that ship has commenced comprising at least 50 tonnes or 1% of the estimated mass of all structural material, whichever is less. **Related Instruments** • **A.1137(31) - Interim safety measures for ships not certified under the SOLAS Convention operating in polar waters** • **MSC.385(94) - International Code for Ships Operating in Polar Waters (Polar Code)** • **MSC.538(107) - Amendments to the International Code for Ships Operating in Polar Waters (Polar Code)**

491

Adopted by
MSC.532(107)

Entry into force
1 January 2026

Class News
No. 19/2025

Amendments to SOLAS Chapter V and associated certificates - Mandatory carriage of electronic inclinometers on container ships and bulk carriers

Background: The loss of containers due to the heavy movement of container ships at sea or the movement of bulk cargoes liable to liquefaction or dynamic separation, have caused incidents in recent years that have resulted in many seafarers losing their lives and the loss at sea of containers with high value contents (notably the loss of over 300 containers from the *MSC Zoe* in January 2019). Electronic inclinometers help with the operational assessment of ship stability, and they are not considered as critical equipment for the safety of navigation. However, the data they measure, if recorded in the Voyage Data Recorder (VDR), will be helpful in accident investigations. So, MSC 107 adopted amendments to SOLAS Chapter V and associated certificates for the mandatory carriage of electronic inclinometers which are linked to the VDR.

Implication: **Shipyards, designers, and shipowners** will need to comply with the new requirements, which apply to new bulk carriers and container ships.
The new requirements will not apply to:

- Cargo ships occasionally carrying cargoes in bulk.
- General cargo ships carrying containers on deck.

Application: The new regulations will enter into force 1 January 2026 and will be applicable to new bulk carriers and container ships of 3,000GT and above, constructed* on or after this date. The requirements will not apply retroactively to existing container ships and bulk carriers.

*In the context of SOLAS V/2.1, “constructed” means:
A stage of construction where:

- the keel is laid;
- construction identifiable with a specific ship begins; or
- assembly of the ship has commenced comprising at least 50 tonnes or 1% of the estimated mass of all structural material whichever is less.

Related Instruments

- **MSC.363(92) - Performance standards for electronic inclinometers**
- **Amendments to forms of the Cargo Ship Safety Equipment Certificate and the Cargo Ship Safety Certificate:**
- **MSC.533(107) - Amendments to the Protocol of 1978 relating to the International Convention for the Safety Of Life At Sea, 1974**
- **MSC.534(107) - Amendments to the Protocol of 1988 relating to the International Convention for the Safety Of Life At Sea, 1974**

525

Adopted by
MSC.556(108)

Amendments 42-24 to the International Maritime Dangerous Goods (IMDG) Code

Background: The IMDG Code is regularly reviewed to take into account new requirements for existing substances or new substances. The next amendments are published as Amendment 42-24 and are included in the 2024 Edition.

Entry into force **1 January 2026**	**Implication:** The revisions will add new amendments to the Code and new and/or revised requirements for both new and existing substances. Such amendments include (but are not limited to): • changes to the definition for "Recycled plastics material" • new definition for "Degree of filling" • amendments to “Classification of articles as articles containing dangerous goods N.O.S.” • new definition for "Explosive or pyrotechnic effect" • new definition for "Metal powders" • amendments to the table under "List of currently assigned organic peroxides in packaging" in the entry for for "DI-2,4-DICHLOROBENZOYL PEROXIDE" • new entries: DIBENZOYL PEROXIDE, 2,5-DIMETHYL-2,5-DI-(tert-BUTYLPEROXY) HEXANE, METHYL ETHYL KETONE PEROXIDE(S) • new section in Chapter 2.9.2 Assignment to class 9 - introducing "Sodium ion batteries" • pharmaceutical products (such as vaccines) that are packed in a form ready to be administered, including those in clinical trials, and that contain GMMOs or GMOs are not subject to this Code. • amendments to Chapter 3.2 - Dangerous Goods List • amendments to Chapter 3.3 - Special provisions applicable to certain substances, materials or articles • amendments to Chapter 4.1 - Use of packaging, including intermediate bulk containers (IBCs) and large packaging • amendments to 4.1.6 Special packing provisions for goods of class 2 • amendments to Chapter 4.2 - Use of portable tanks and multiple-element gas containers (MEGCs) • amendments to Chapter 5.2 - Marking and labelling of packages including IBCs • amendments to Chapter 5.3 - Placarding and marking of cargo transport units and bulk containers • amendments to Chapter 5.5 - Special provisions • amendments to Chapter 6.1 - Provisions for the construction and testing of packaging (other than for class 6.2 substances) • amendments to Chapter 6.2 - Provisions for the construction and testing of pressure receptacles, aerosol dispensers, small receptacles containing gas (gas cartridges) and fuel cell cartridges containing liquefied flammable gas • amendments to Chapter 6.5 - Provisions for the construction and testing of intermediate bulk containers (IBCs) • amendments to Chapter 6.6 - Provisions for the construction and testing of large packaging • amendments to Chapter 6.7 - Provisions for the design, construction, inspection and testing of portable tanks and multiple-element gas containers (MEGCs) • amendments to Chapter 6.10 - Provisions for the design, construction, inspection and testing of portable tanks with shells made of fibre-reinforced plastics (FRP) materials • new entries in Appendix B - Glossary of terms Please note that IMO has published an editorial corrigendum (MSC 108/20/Add.2/Corr.1) on 14th November 2025. For any questions on this matter please contact LR.

	Application: These amendments to the IMDG Code apply to all ships (including cargo ships of less than 500GT) that carry dangerous goods in packaged form from 1 January 2026. It is possible to apply these amendments prior to that date, subject to the agreement of the Flag Administration. **Related Instruments** • **MSC.1/Circ.1588/Rev.3 - Revised emergency response procedures for ships carrying dangerous goods (EmS Guide)** • **MSC 108/20/Add.2/Corr.1 - 2025 editorial corrigendum**
527 Adopted by **MSC.552(108)** Entry into force **1 January 2026** Class News No. 09/2025	**Amendments to the International Code for the Safe Carriage of Grain in Bulk (MSC.23(59)) - loading conditions** **Background:** The International Code for the Safe Carriage of Grain in Bulk prescribes three loading conditions for the safe stowage of grain: "filled compartment, trimmed", a "filled compartment, untrimmed" and a "partly filled compartment". It has been observed that, in practice, there might be discrepancies such as when grain is filled up to or above the bottom edge of the hatch end beams, but not to the highest possible level in way of the hatch opening. **Implication:** **Shipowners and operators** of ships carrying grain in bulk should take note of new provisions for loading grain when dealing with "partially filled compartments" and how to calculate the total heeling moment. **Application:** It applies to all cargo ships, including those of less than 500GT, carrying grain in bulk from the 1 January 2026.
532 Adopted by **MEPC.384(81)** **MSC.550(108)** Entry into force **1 January 2026** Class News No. 18/2025	**Amendments to SOLAS V/31 and V/32, and to Protocol I of MARPOL Article V - Reporting on the loss of containers** **Background:** Following the recurrent loss of containers, and in response to the danger submerged containers pose to shipping, MSC 108 adopted amendments to SOLAS Chapter V to make the reporting of lost, or the observance of lost, freight containers mandatory through a standardised procedure. In the same context, MEPC 81 also adopted amendments to Article V of Protocol I of the MARPOL Convention. **Implication:** The Master of every ship involved in the loss of any number of freight containers is required to report the incident without delay to both the nearest coastal State, any ships in the vicinity and to the Flag State. The Master of every ship that observes freight container(s) drifting at sea, shall communicate the particulars of such an observation to any ships in the vicinity and to the nearest coastal State. **Application:** The regulations apply to any ship carrying one or more containers or observing lost containers. The amendments enter into force 1 January 2026.

556

Adopted by
MSC.553(108)

Entry into force
1 January 2026

Amendments to the 2011 ESP Code - Modifications to the Procedures for approval and certification of a firm engaged in thickness measurement of hull structures

Background: The amendments will better specify that Administrations can exercise the right to audit a firm conducting thickness measurement of hull structures. The current text in the ESP Code was observed to be unclear on this matter.

Implication: The impact of the proposed changes should be minimal and affect those Administrations which might want to certify a firm for thickness measurement.

Application: This specific amendment should affect Administrations engaged in approval of firms conducting thickness measurement of the hull structures of bulk carriers and oil tankers of 500GT and above.

573

Adopted by
MSC.560(108)

Entry into force
1 January 2026

Amendments to the STCW Code - Prevention and response to violence and harassment, including sexual harassment, bullying and sexual assault

Background: The Joint ILO/IMO Tripartite Working Group to identify and address seafarers' issues and the human element recognised the need to tackle bullying and harassment in the maritime sector, including sexual assault and sexual harassment, with the objective of ensuring a safe workplace for seafarers. A new mandatory competence has been developed in the STCW Code, Table A-VI/1-4, on the prevention and response to violence and harassment, including sexual harassment, bullying and sexual assault.

Implication: Seafarers will need to undertake specific training to be considered as competent.

Application: All seafarers.

585

Adopted by
MSC.554(108)

Entry into force
1 January 2026

Amendments to the International Life-Saving Appliance (LSA) Code- Launching appliances using falls and a winch

Background: The current minimum lowering speed of survival craft and rescue boats, as specified in paragraph 6.1.2.8 of the LSA Code, can be expressed in relation to the launching height. This height refers to the distance from the davit head to the waterline when the ship is at its lightest sea-going condition. However, in recent years, larger cargo ships have been under construction, and the launching heights of certain types of cargo ships are expected to increase in the near future. For instance, a 20,000 TEU containership may have a launching height of 35m, requiring a minimum lowering speed of 1.1 m/s. The new requirements address the minimum and maximum lowering speed of survival craft and rescue boats.

Implication:
Equipment manufacturers: are to ensure their equipment meets the new requirements which aim to limit the maximum lowering speed of a fully loaded survival craft or rescue boat to 1.3 m/s. Also to be aware that the amendment was adopted specifying that the minimum lowering speed of survival craft and rescue boats should be limited at an appropriate value of 1.0 m/s, when the launching height is more than 30m.

Shipowners of cargo ships/ shipyards: are to be aware of the new requirements which will enter into force on 1 January 2026.
There will likely be little impact on passenger ships, as they already adhere to a davit height limitation in SOLAS regulation III/24.

Application: The amendments enter into force on 1 January 2026. They will apply to survival craft and rescue boats installed on cargo ships of 500GT and over and passenger ships on or after 1 January 2026.
The expression "installed on or after 1 January 2026" means:

(a) for ships for which the building contract is placed on or after 1 January 2026, or in the absence of the contract, the keels of which are laid or which are at a similar stage of construction on or after 1 January 2026, all installations of survival craft and rescue boats on board those ships; or
(b) for ships other than those ships specified in (a) above, all installations of survival craft and rescue boats, having a contractual delivery date for the equipment to the ship on or after 1 January 2026 or, in the absence of a contractual delivery date to the ship, actually delivered to the ship on or after 1 January 2026.

650

Adopted by
MSC.536(107)

Entry into force
1 January 2026

Class News
No. 16/2025

Amendments to the International Code of Safety for High-Speed Craft, 1994 (1994 HSC Code) Chapter 7 – Provisions to prohibit the use of fire-fighting foams containing PFOS

Background: The IMO developed amendments to SOLAS chapter II-2 and consequential amendments to other instruments to prohibit the use of fire-fighting foams containing perfluorooctane sulfonic acid (PFOS) due to its toxic nature.
The prohibition applies to both fixed and portable systems as the intent is to prohibit the use of all extinguishing media containing PFOS that can be used in fire extinguishing systems and equipment. Amendments are also applied to the 1994 (MSC.536(107)) and 2000 (MSC.537(107)) HSC Codes.

Implication: Fire fighting foams containing PFOS will be banned, and any substances containing PFOS will need to go to appropriate shore reception facilities.

Equipment manufacturers: are to take note and change the chemical make up of extinguishing media.

Shipowners and Ship operators: are to comply with carriage ban and remove the PFOS containing extinguishing media from ships to reception facilities ashore.

Application: Applies to new and existing ships not later than the date of the first initial, annual, periodical or renewal survey (for passenger ship safety certificate, cargo ship safety equipment certificate, cargo ship safety certificate and high speed craft safety certificate), whichever occurs first, after 1 January 2026.

	Related Instruments • **MSC.532(107) - Amendments to SOLAS chapter II-2** • **MSC.537(107) - Amendments to the International Code of Safety for High-Speed Craft, 2000 (2000 HSC Code) Chapter 7** • **MSC.1/Circ.1694 - Unified interpretations of SOLAS chapter II-2, and the 1994 and 2000 HSC Codes**
651 Adopted by **MSC.537(107)** Entry into force **1 January 2026** Class News No. 16/2025	**Amendments to the International Code of Safety for High-Speed Craft, 2000 (2000 HSC Code) Chapter 7 - Provisions to prohibit the use of fire-fighting foams containing PFOS** **Background:** The IMO developed amendments to SOLAS chapter II-2 and consequential amendments to other instruments to prohibit the use of fire-fighting foams containing perfluorooctane sulfonic acid (PFOS) due to its toxic nature. The prohibition applies to both fixed and portable systems as the intent is to prohibit the use of all extinguishing media containing PFOS that can be used in fire extinguishing systems and equipment. Amendments are also applied to SOLAS chapter II-2 (MSC.532(107)) and 1994 HSC Code (MSC.536(107)). **Implication:** Fire fighting foams containing PFOS will be banned, and any substances containing PFOS will need to go to appropriate shore reception facilities. **Equipment manufacturers**: are to take note and change the chemical make up of extinguishing media. **Shipowners and Ship operators**: are to comply with carriage ban and remove the PFOS containing extinguishing media from ships to reception facilities ashore. **Application:** Applies to new and existing ships not later than the date of the first initial, annual, periodical or renewal survey (for passenger ship safety certificate, cargo ship safety equipment certificate, cargo ship safety certificate and high speed craft safety certificate), whichever occurs first, after 1 January 2026. **Related Instruments** • **MSC.532(107) - Amendments to SOLAS chapter II-2** • **MSC.536(107) - Amendments to the International Code of Safety for High-Speed Craft, 1994 (1994 HSC Code) Chapter 7** • **MSC.1/Circ.1694 - Unified interpretations of SOLAS chapter II-2, and the 1994 and 2000 HSC Codes**
658 Adopted by **MSC.555(108)**	**Amendments to the Fire Safety Systems (FSS) Code - fire safety on Ro-Ro passenger ships (Chapter 7 amendments) and all ships (Chapter 9 amendments)** **Background:** The IMO has reviewed SOLAS chapter II-2 and the FSS Code with regard to vehicle, special category, ro-ro spaces and weather decks of new and existing ro-ro ships based on the findings of the FIRESAFE II study. It should be noted that IMO issued the *Interim guidelines for*

Entry into force **1 January 2026**	*minimising the incidence and consequences of fires in ro-ro spaces and special category spaces of new and existing ro-ro passenger ships* (MSC.1/Circ.1615), pending changes to SOLAS, to address the risks related to ro-ro passenger ships. The amendments to the FSS Code, chapter 7 provide specifications for fixed water-based fire-extinguishing systems on ro-ro passenger ships fitted with weather decks intended for the carriage of vehicles. The amendments to the FSS Code, chapter 9/2.3 (Component requirements) and chapter 9/2.4 (Installation requirements) relate to linear heat detectors and positioning of detectors for combined smoke and heat detectors. The amendments to the FSS Code, chapter 9/2.5 (System control requirements) relate to visual and audible fire signals on ro-ro passenger ships. **Implication:** **Shipyards and equipment manufacturer**s will need to comply with the new requirements. **Application:** The amendments to the FSS Code chapter 7 apply to ro-ro passenger ships fitted with weather decks intended for the carriage of vehicles constructed on or after 1 January 2026. The amendments to the FSS Code chapter 9/2.3 (Component requirements) and chapter 9/2.4 (Installation requirements) apply to ships constructed on or after 1 January 2026. The amendments to the FSS Code chapter 9/2.5 (System control requirements) apply to ro-ro passenger ships constructed on or after 1 January 2026.“Ships constructed on or after 1 January 2026” mean ships, the keels of which are laid or which are at a similar stage of construction, on or after 1 January 2026. **Related Instruments** • **MSC.550(108) – Amendments to SOLAS II-2** • **MSC.1/Circ.1695 - Unified interpretation of the FSS Code**
661 Adopted by **MSC.559(108)** Entry into force **1 January 2026**	**Amendments to the resolution MSC.402(96) - Requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear** **Background:** As a consequence of the agreed amendments to the LSA Code and resolution MSC.81(70) with regard to new ventilation requirements for totally enclosed lifeboats, MSC 108 adopted an amendment to resolution MSC.402(96). This amendment includes the requirement for the examination and check of the 'ventilation system, where fitted' for satisfactory condition and operation on lifeboats (including free-fall lifeboats), rescue boats, and fast rescue boats.

	Implication: Authorised Service Providers: Totally enclosed lifeboats will need to undergo satisfactory examination and check with regard to their ventilation systems as per the new requirements detailed in MSC.535(107). **Application:** This will apply from 1 January 2026, but given that the new requirements for the ventilation of totally enclosed lifeboats applies to those installed on ships on or after 1 January 2029, it is not expected to be required to take place until such totally enclosed lifeboats are installed. **Related Instruments** • **MSC.535(107) Amendments to the International Life-Saving Appliance Code (LSA Code)**
670 Adopted by **MSC.561(108)** Entry into force **1 January 2026**	**Revised annex to the International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel, 1995 (STCW-F)** **Background:** The International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F), sets certification and minimum training requirements for crews of seagoing fishing vessels with the aim to promote the safety of life at sea and the protection of the marine environment, taking into account the unique nature of the fishing industry and the working environment. Amendments inter *alia include*: • Requirements related to the use of simulators • Requirements for medical fitness of fishing vessel personnel • Clarity on when competency under the 1978 STCW Convention may be accepted • An additional option for accepted seagoing service for navigational officer candidates **Implication: Shipowners** of seagoing fishing vessels will need to ensure that personnel serving onboard are suitably qualified under the STCW-F Convention and Code. **Application:** Applies to personnel serving onboard seagoing fishing vessels flying the flag of a Party to the STCW-F Convention. **Related Instruments** • **MSC.562(108) - Standards of Training, Certification and Watchkeeping for Fishing vessel Personnel (STCW-F) Code.**
671 Adopted by **MSC.562(108)**	**Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F) Code** **Background:** The new STCW-F Code contains mandatory provisions to which specific reference is made in the annex to the STCW-F Convention. These requirements provide the minimum standards required to be maintained by Parties in order to give full and complete effect to the Convention. Also included are standards of competence required to be demonstrated by candidates for the issue and revalidation of certificates of competency under the provisions of the STCW-F Convention. The abilities specified in the standards of competence are grouped, as appropriate, under the following seven functions:

Entry into force **1 January 2026**	• Navigation • Catch handling and stowage • Controlling the operation of the vessel and care for persons on board • Marine engineering • Electrical, electronic and control engineering • Maintenance and repair • Radiocommunications at the following levels of responsibility: • Management level • Operational level • Support level **Implication:** **Shipowners** of seagoing fishing vessels will need to ensure that personnel serving onboard are suitably qualified under the STCW-F Convention and Code. **Application:** Applies to personnel serving onboard seagoing fishing vessels flying the flag of a Party to the STCW-F Convention. **Related Instruments** • **MSC.561(108) - Revised annex to the International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel, 1995 (STCW-F)**
676 Adopted by **MSC.550(108)** Entry into force **1 January 2026**	**Amendments to SOLAS regulation II-2/4 related to oil fuel parameters other than flashpoint** **Background:** The amendment adds a new sub-paragraph to SOLAS II-2/4 to ensure that oil fuel delivered to and used on board ships shall not jeopardise the safety of ships or adversely affect the performance of the machinery or be harmful to personnel. **Implication:** **Oil fuel suppliers**: Will need to comply with the new requirements. **Ship managers and crews**: Will need to ensure that they order oil fuel that is suitable for the ship and not harmful to personnel. **Application:** This amendment to SOLAS will enter into force on 1 January 2026. It applies to all cargo ships of 500GT and over and to all passenger ships.

770

Adopted by
MEPC.392(82)

Entry into force
1 March 2026

Class News
No. 05/2025

Amendments to MARPOL Annex VI establishing the Canadian Arctic Emission Control Area (ECA) for nitrogen oxides, sulphur oxides and particulate matter

Background: MEPC 82 adopted amendments to MARPOL Annex VI which will give effect to an ECA in the Canadian Arctic for NOx and SOx.

This ECA is comprised of two segments starting at the Yukon mainland at 68.900° North 137.000° West; and ending at the north coast of Hans Island at 80.83183° North 66.45667° West and continuing from the south coast of Hans Island at 80.82144° North 66.45067° West, and ending at the coast of Newfoundland and Labrador at 60.000° North, 64.160° West.

Implication: **Shipowners and operators** should be aware that for ships ordered for keel laying on or after 1 January 2025 and intending to operate in the ECA will need to install a NOx Tier III engine.

In addition, shipowners and operators should be aware that from 1 March 2027, the sulphur limit of fuel oil used on board must not exceed 0.10%m/m or to use an alternative compliance method such as an Exhaust Gas Cleaning System.

Application: NOx requirements: Ships the keels of which are laid or at a similar stage of construction on or after 1 January 2025 which have a marine diesel engine with power output of more than 130kW and operating within the ECA

SOx requirements: Ships operating in the ECA from 1 March 2027

771

Adopted by
MEPC.392(82)
Entry into force
1 March 2026

Class News
No. 05/2025

Amendments to MARPOL Annex VI establishing the Norwegian Sea Emission Control Area (ECA) for nitrogen oxides, sulphur oxides and particulate matter

Background: MEPC 82 adopted amendments to MARPOL Annex VI to give effect to an ECA in the Norwegian Sea. This ECA is defined as the same area specified in MARPOL Annex II regulation 13.9.4.

Implication: **Shipowners and operators** should be aware that for ships with a building contract placed on or after 1 March 2026, keel laying or similar stage of construction on or after 1 September 2026 (in the absence of a building contract) or delivered on or after 1 March 2030 and intending to operate in the ECA will need to install a NOx Tier III engine.

In addition, shipowners and operators should be aware that from 1 March 2027, the sulphur limit of fuel oil used on board must not exceed 0.10%m/m or to use an alternative compliance method such as an Exhaust Gas Cleaning System.

Application: NOx requirements: Ships which have a marine diesel engine with power output of more than 130kW and which will operate in the ECA to which the building contract is placed on or after 1 March 2026;

- In the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 1 September 2026; or

	• The delivery of which is on or after 1 March 2030. SOx Requirements: Ships operating in the ECA from 1 March 2027.
785 Adopted by **MSC.566(109)** Entry into force **1 July 2026**	**Amendment to the IGC Code - paragraph 16.9 - Alternative fuels and technologies - on the possibility to use toxic cargo as fuel if accepted by the Administration** **Background:** IGC Code Chapter 16.9 - *Alternative fuels and technologies* has been amended to allow the use of toxic cargo as fuels, subject to approval of the ship's flag Administration. **Implication:** Gas carriers, to which this amendment applies, will be allowed to use toxic cargo as fuel if they are able to demonstrate an equivalent level of safety to using natural gas (methane) carried as cargo as fuel. Special agreement from the ship's flag Administration will be required to permit this from 1 July 2026. **Application:** The amendments apply to new and, retroactively, to existing 2G/2PG ships which carry cargoes identified as toxic products in the IGC Code and are subject to the IGC Code. **Related Instruments** • **MSC.1/Circ.1681 - Voluntary early implementation of the amendments to chapter 16 of the IGC Code, adopted by Resolution MSC.566(109)**
731 Adopted by **MEPC.398(83)** Entry into force **1 September 2026**	**Amendments to the NOx Technical Code with regard to certification of an engine subject to substantial modification or being certified to a Tier to which the engine was not certified at the time of its installation** **Background:** Noting MARPOL Annex VI, regulation 13, permits substantial modifications and therefore re-certification of already installed engines, these amendments to the NOx Technical Code set out the procedure for such a re-certification which has not previously been specified. These amendments also capture instances where an existing engine is to be certified to a Tier to which it was not certified at the time of installation in which case the same procedure is to be followed. **Implication:** **Ship Owners and Operators**: Should be aware that any existing marine diesel engine already installed with a power output of more than 130kW which undergoes modification which alters the NOx parameters, or is to be certified to a NOx Tier it was not certified to at the point of instillation, is to follow the procedure newly introduced to the NOx Technical Code. **Applicants Seeking re-certification**: Should familiarise themselves with the detail of the procedure and be aware that they must prepare an Engine Emission Test Plan to be agreed by the ship's Administration or their Recognised Organisation before the testing regime is conducted. Guidance is

	available on the content of the Engine Emission Test Plan which will be published by the IMO at the time of the amendments to the Code entering force. **Application:** This applies to any marine diesel engine with a power output of more than 130kW which undergoes a substantial modification, or is to be certified to a NOx Tier to which it was not certified at the time of certification, therefore requiring re-certification.
709 Adopted by **MSC.575(110)** Entry into force **1 January 2027**	**Amendments to the IMSBC Code (Amendment 08-25)** **Background:** The IMSBC Code is regularly reviewed to take account of new requirements for existing substances or new substances. These amendments have been published as Amendment 08-25. **Implication:** The new amendments are, but not limited to: • Amendments to existing individual schedules: - ALUMINIUM FERROSILICON POWDER UN 1395 - ALUMINIUM SILICON POWDER, UNCOATED UN 1398 - ALUMINIUM SMELTING BY-PRODUCTS or ALUMINIUM REMELTING BY-PRODUCTS UN 3170 - CASTOR BEANS or CASTOR MEAL or CASTOR POMACE or CASTOR FLAKE UN 2969 - FERROSILICON UN 1408 with 30% or more but less than 90% silicon (including briquettes) - FERROSILICON with at least 25% but less than 30% silicon, or 90% or more silicon - FISH MEAL (FISH SCRAP), STABILIZED Anti-oxidant treated, (group B) - IRON ORE PELLETS - DIRECT REDUCED IRON (A) - DIRECT REDUCED IRON (B) - FERROUS METAL BORINGS, SHAVINGS, TURNINGS or CUTTINGS UN 2793 • New individual schedules: - FISH MEAL (FISH SCRAP), STABILIZED, (group C) - PHOSPHATE ROCK FINES (uncalcined) IRON ORE BRIQUETTES - ZINC SLAG (coarse) - APATITE CONCENTRATE - TUFF (COARSE) - ALUMINIUM SULPHATE GRANULAR - FERRIC SULPHATE GRANULAR - CRUSHED GRANODIORITE, COARSE - ASPHALT GRANULATES - PEA PROTEIN CONCENTRATE PELLETS • Other draft amendments include: - Editorial modifications to the segregation tables in 9.3.3. - Various editorial amendments to update references to updated circulars.

- A number of cargoes are to be considered non-cohesive when dry:
  - ALUMINIUM SULPHATE GRANULAR
  - ASPHALT GRANULATES
  - CRUSHED GRANODIORITE, COARSE
  - FERRIC SULPHATE GRANULAR
  - PEA PROTEIN CONCENTRATE PELLETS
  - PHOSPHATE ROCK FINES (uncalcined)

MSC 110 (June 2025) has adopted the amendments.

Application: The amendments are applicable to all ships (including cargo ships of less than 500GT) carrying goods in solid bulk form from 1 January 2027. Administrations can voluntarily apply the amendments from 1 January 2026.

Related Instruments

- **MSC.1/Circ.1395/Rev.7 - Lists of solid bulk cargoes for which a fixed gas fire-extinguishing system may be exempted or for which a fixed gas fire-extinguishing system is ineffective**
- **MSC.1/Circ.1264/Rev.1 - Revised recommendations on the safe use of pesticides in ships applicable to the fumigation of cargo holds**
- **MSC.1/Circ.1358/Rev.1 - Revised recommendations on the safe use of pesticides in ships**

467

Adopted by
MEPC.397(83)

Entry into force
1 March 2027

Amendments to MARPOL Annex VI and the NOx Technical Code on the use of multiple engine operational profiles for a marine diesel engine

Background: The amendments to the Code control the use of auxiliary control devices for new and existing engines (that undergo significant modification) and address 'defeat devices' intended to circumvent the purpose of the NOx Technical Code. They also facilitate the certification of engines that are capable of operating in multiple profiles.

The amendments introduce the definition and control of a rational emissions control strategy which aims to ensure that the emissions values at the individual mode points used during engine certification testing are representative of the emissions values during normal operation. Further the amendments require such a rational control strategy to be applied to each engine across the whole of its operating load and speed range therefore ensuring an engine has not been designed to circumvent the intent of the NTC.

Implication:
Engine manufacturers: will need to ensure engines not certified in the lead up to the implementation dates are capable of compliance and any manufacturer considering an upgrade or modification to an existing certified product could potentially be causing a substantial modification therefore making the additional requirements applicable.

	Owners and operators of ships with engines subject to the NTC: If considering a modification to an existing engine there is a need to be aware of the applicable definition of 'substantial modification'. If the modification being considered fits the definition, owners need to be aware of the implications and methods for seeking re-certification and the additional requirements that may not have been applicable at time of original engine certification. **Application:** The amendments to the Code apply to engines with power output of more than 130kW. MEPC confirmed that the amendments will enter into force on 1 March 2027, however, their implementation will be as follows: For new individual or parent engines not previously certified, the new requirements apply from 1 January 2028 based on the date of the EIAPP Certificate. For a new member engine to a family or group for which the parent engine was certified before 1 January 2028, prior to the certification of the member engine it will need to be shown that the engine family or group meet the new requirements by 1 January 2030 based on the date of the EIAPP for the member engine. For existing engines which are already certified, the new requirements do not apply unless the engine is subject to substantial modification on or after 1 January 2028, i.e. for installations on board ships constructed before 1 January 2000, this is to engines which undergo a substantial modification, being a modification that increases existing emission characteristics; and for installations on board ships constructed on or after 1 January 2000 this is to engines which undergo a substantial modification if an auxiliary control device is used and/or the engine has multiple operational profiles. In the case of identical replacement of an engine installation on or after 1 January 2028 the version of the Code at the time of the EIAPP is issued continues to apply unless the replaced engine is equipped with multiple operational profiles, in which case the new requirements apply.
ILO16 Adopted by **Amendments of 2025 to the MLC, 2006** Entry into force **23 December 2027**	**Amendment to MLC, 2006 - Standard A2.5.1 on repatriation** **Background:** During the Covid-19 pandemic seafarers struggled to travel to and from the ships they were working on. This created considerable challenges for the industry and left seafarers stranded. Consequently new requirements within the Maritime Labour Convention, 2006 (MLC, 2006) have been agreed for the repatriation of seafarers. **Implication:** Member States are to facilitate the repatriation of seafarers without discriminating against them on any grounds. This is irrespective of the flag State of the ship on which they are employed, engaged or work. When repatriating seafarers, its been clarified that shipowners should at least cover the costs of: • passage to the destination selected for the seafarer; • accommodation and food from when seafarers leave the ship to when they arrive at their destination; • transportation of up to 30kg of the seafarer's luggage to the destination; and

	• medical treatment, when necessary, until the seafarers are medically fit to travel to the repatriation destination. Supporting guidance has been issued along with the above requirements which says that the shipowner's costs mentioned above for seafarer repatriation should also include pay and allowances from when the seafarer leaves the ship until they reach the repatriation destination, when provided for by national laws, regulations or collective agreements. Supporting guidance has also been issued that says that member States should designate seafarers as key workers. This will require them to facilitate their travel in connection with their employment or work as a seafarer, which includes but is not limited to: • access to shore leave; • repatriation; • crew changes; and • medical care ashore. **Application:** The Maritime Labour Convention applies to all commercial vessels undergoing voyages outside their flag jurisdiction or outside the declared sheltered waters of their flag State to which the MLC, 2006 applies.
ILO17 Adopted by **Amendments of 2025 to the MLC, 2006** Entry into force **23 December 2027**	**Amendments to MLC, 2006 - Standard A2.4 on shore leave** **Background:** Seafarers have always struggled in some ports to go ashore for a break from the ship on which they live and work. Its important for their welfare that they get that short break. During the Covid-19 pandemic seafarers struggled more than normal to go ashore as borders closed. There are new requirements in the Maritime Labour Convention, 2006 (MLC, 2006) around shore leave. **Implication:** A new standard has been agreed on shore leave which places obligations on both the member State and on shipowners. Member States will be required to allow shore leave whilst a ship is in port on condition that all the relevant formalities have been fulfilled and there is no reason to refuse permission based on public health, security, public safety or public order. Where shore leave is refused, that is to be communicated by the public authorities in the port State to the Master and, if requested by the Master or seafarer, those reasons are to be communicated in writing. There should be no discrimination on any grounds on who is permitted to have shore leave. This is irrespective of the flag State of the ship on which they are employed, engaged or work. **Seafarers** will not be required to hold a visa or permit for shore leave. **Shipowners** will be required to permit shore leave for off duty seafarers when in port, unless the port State has the aforementioned restrictions in place, or it is unsafe or operationally unfeasible to do so.

	Supporting guidelines say that in cooperation with shipowners' and seafarers' organisations member States are to establish procedures on board ships and in ports to facilitate shore leave for seafarers. They should also ensure that port and terminal personnel are informed and trained on seafarers' rights to shore leave. **Application:** The MLC, 2006 applies to all commercial vessels undergoing voyages outside their flag jurisdiction or outside the declared sheltered waters of their flag State to which the MLC, 2006 applies.
ILO20 Adopted by **Amendments of 2025 to the MLC, 2006** Entry into force **23 December 2027**	**Amendment to the MLC, 2006 on the investigation of marine casualties** **Background:** Marine casualties occur from time to time and when they do it is important that seafarers are treated with respect and fairness. **Implication:** When carrying out an inquiry into a marine casualty, member States are to take due account of the IMO Code of the *International Standards and Recommended Practices for a Safety Investigation into a Marine Casualty or Marine Incident*, and the *recommendations of the ILO/IMO Guidelines on the Fair Treatment of Seafarers in the event of a maritime accident and the ILO/IMO Guidelines on Fair Treatment of Seafarers detained in connection with alleged crimes*. They should also co-operate as far as practicable with concerned States in applying the above guidelines. **Application:** The MLC, 2006 applies to all commercial vessels undergoing voyages outside their flag jurisdiction or outside the declared sheltered waters of their flag State to which the MLC, 2006 applies. This requirement is placed on Member States.
ILO21 Adopted by **Amendments of 2025 to the MLC, 2006** Entry into force **23 December 2027**	**Amendment to the MLC, 2006 on onboard complaints procedures** **Background:** The Maritime Labour Convention, 2006 provides for there to be a process by which seafarers can make complaints. This has been strengthened with the latest agreed amendments. **Implication:** Seafarers will have an additional way to make a complaint as in addition to complaining to the Master or external authorities. They will be able to complain to appropriate shoreside personnel. Seafarers should not be victimised when filing complaints. Confidentiality of their complaints must be safeguarded. The term 'victimisation' is extended to include any adverse action taken by any person with respect to complainants, victims, witnesses and whistle-blowers. However, due regard should also be given against vexatious or malicious complaints. **Application:** The MLC, 2006 applies to all commercial vessels undergoing voyages outside their flag jurisdiction or outside the declared sheltered waters of their flag State to which the MLC, 2006 applies.

ILO23

Adopted by
Amendments of 2025 to the MLC, 2006

Entry into force
23 December 2027

Amendments to the MLC, 2006 on the prevention of shipboard violence and harassment, including sexual harassment, bullying, and sexual assault

Background: The prevention of violence, harassment and sexual assault has been considered by the IMO's Maritime Safety Committee recently, and consequently seafarer training is now required under the STCW Convention. That work is now extended to the ILO where seafarer welfare is regulated.

Implication: A new requirement has been agreed that shipboard violence and harassment, including sexual harassment, bullying, and sexual assault is to be prevented and eliminated through national laws set by member States. Consequently, shipowners will be required to put in place measures to prevent shipboard violence and harassment, including sexual harassment, bullying and sexual assault. Seafarers will be required to comply with those measures.

Governments will be expected to put in place safe, fair and effective reporting mechanisms and procedures for cases of shipboard violence and harassment, including sexual harassment, bullying and sexual assault.

Supporting guidelines have been issued that say that when establishing the system of licencing and certification of seafarers' recruitment and placement services, member States should require their recruitment and placement procedures to address measures to prevent and address violence and harassment, including sexual harassment, bullying and sexual assault.

Further supporting guidelines say that governments are to ensure that the implications for health and safety include shipboard violence and harassment, including sexual harassment, bullying and sexual assault when drawing up national guidelines for the management of occupational safety and health. Member State occupational health and safety protection measures should take account of the ILO's *Violence and Harassment Recommendation, 2019 (No. 206)*.

Application: The Maritime Labour Convention applies to all commercial vessels undergoing voyages outside their flag jurisdiction or outside the declared sheltered waters of their flag State to which the MLC, 2006 applies.

442

Adopted by
MSC.549(108)

Entry into force
1 January 2028

Amendments to SOLAS - New Regulation II-1/3-4.2 – Emergency towing arrangements for new ships, other than tankers, of 20,000GT and over

Background: The IMO has agreed a revision to SOLAS chapter II-1, regulation 3-4, which extends the scope of the requirements for emergency towing arrangements to new ships other than tankers of 20,000GT and over. The amended regulation will enter into force on 1 January 2028. MSC 110 also approved new supporting guidelines for ships other than tankers (MSC.1/Circ.1691) and amendments to MSC.1/Circ.1175/Rev.1 - *Revised guidance on shipboard towing and mooring equipment* and MSC.1/Circ.1255 - *Revised guidelines for owners/operators on preparing emergency towing procedures*.

Implication: New ships will need to be fitted with towing arrangements which must, at all times, be capable of rapid deployment in the absence of main power on the ship and have adequate strength based on the size of the ship and the expected forces during bad weather conditions. The design and construction and prototype testing of emergency towing arrangements must be approved by the Administration or their Recognised Organisations.

Application: Emergency towing arrangements are to be fitted on ships - other than tankers - of 20,000GT and above, constructed on or after 1 January 2028.

The expression "ships constructed" means ships the keels of which are laid, or which are at a similar stage of construction. In addition, the term “a similar stage of construction” means the stage at which:

- construction identifiable with a specific ship begins; and
- assembly of that ship has commenced comprising at least 50 tonnes or one per cent of the estimated mass of all structural material, whichever is less.

Related Instruments

- **MSC.1/Circ.1691 - Interim guidelines for emergency towing arrangements on ships other than tankers**
- **MSC.1/Circ.1255/Rev.1 - Revised guidelines for owners/operators on preparing emergency towing procedures**

609

Adopted by
MSC.573(110)
MSC.574(110)

Entry into force
1 January 2028

Amendments to paragraph 8.3.5 and annex 1 of the 1994 and 2000 HSC Codes with regard to lifejacket carriage requirements of SOLAS chapter III

Background: The IMO adopted the amendments to paragraph 8.3.5 (lifejackets carriage requirements) and annex 1 (HSC Safety Certificate) of the 1994 and 2000 HSC Codes with respect to the number of infant life jackets and accessories to adult life jackets to accommodate large persons to harmonise the lifejacket carriage requirements in the Codes with those in SOLAS chapter III.

The amendments aim to ensure that the safety of infants on high-speed craft in an emergency situation is equal to that of infants on other passenger ships and remove any inconsistencies in terms of definitions and requirements between SOLAS Chapter III and the HSC Codes.

Implication: **Shipowners and operators** of high-speed craft are advised to note the following upcoming lifejacket requirements, entering into force on 1 January 2028. From the first High-Speed Craft Safety Certificate renewal survey:

- Passenger craft on voyages of less than 24h are expected to need to carry infant lifejackets equal to 2.5% of the number of passengers on board;
- Passenger craft on voyages of 24h or greater are expected to need to carry an infant lifejacket for each infant on board; and
- Where adult lifejackets are not designed to fit persons weighing up to 140kg and with a chest girth of up to 1750mm, a sufficient number of accessories shall be available on board to allow them to be secured to such persons.

The Record of Equipment for the High-Speed Craft Safety Certificate shall be updated accordingly.

	Application: This will apply to new and existing high-speed craft. The amendments will enter into force on 1 January 2028 and be applicable no later than the date of the first High-Speed Craft Safety Certificate renewal survey on or after 1 January 2028 for existing craft, and the High-Speed Craft Safety Certificate initial survey for new craft.
642 Adopted by **MSC.572(110)** **MSC.573(110)** and **MSC.574(110)** Entry into force **1 January 2028**	**Amendments to SOLAS regulation V/23, MSC resolution on performance standards and consequential amendments to the 1994 and 2000 HSC Codes, to improve the safety of pilot transfer arrangements** **Background:** Accidents involving the tragic loss of pilots continue to happen worldwide despite previous efforts to improve pilot safety though amendments to SOLAS regulation V/23 (resolution MSC.308(88)) and standards for pilot transfers (resolution A.1045(27)). Statistics published by the International Maritime Pilots Association (IMPA) over the past few years show that an unacceptably high rate of non-compliant pilot transfer arrangements installed on all types of ships, together with the improper use of pilot ladders and a lack of regular and effective maintenance and inspection, are major contributing factors. In response to the above, the IMO has now adopted amendments to SOLAS regulation V/23 to make the performance standards for pilot transfer arrangements mandatory under the SOLAS Convention. An MSC resolution on *Performance standards on pilot transfer arrangements* has been adopted too, which contains detailed requirements for design, manufacture, construction, inspection, maintenance, replacement, rigging and training. There are consequential amendments to the 1994 and 2000 HSC Codes. The IMO, via an MSC circular, has also agreed to encourage interested Administrations to voluntarily implement above amendments prior to the entry into force. **Implication:** **Ship owners/Operators**: will need to comply with the new requirements. Specifically, • Regardless of installation date, all pilot transfer arrangements will be required to undergo inspection, stowage, maintenance, replacement, and familiarisation in accordance with parts D and E of the performance standards. • Accommodation ladders, together with any associated fittings intended for use in accordance with the performance standards are to meet the requirements for the means of embarkation on and disembarkation from ships as required by SOLAS regulation II-1/3-9. This includes those installed prior to 1 January 2010 which do not currently need to comply with SOLAS regulation II-1/3-9. • Regardless of date of installation, maintenance and inspection of accommodation ladders used in the combination arrangement shall be carried out in accordance with SOLAS regulation II-1/3-9.3. **Equipment manufacturers**: The design, manufacture, and construction of pilot transfer arrangements must comply with detailed requirements and be approved in accordance with Part F of the performance standards. **Application:** The new requirements will enter into force on 1 January 2028. A detailed application details are as follows: • All new and existing ships on which pilots may be employed are to be provided with pilot transfer arrangements.

	• Pilot transfer arrangements installed on or after 1 January 2028, are to be designed, manufactured, constructed, secured and installed in accordance with parts A, B and C of the performance standards. "Installed on or after 1 January 2028" means: - a contractual delivery date for the pilot transfer arrangement or, - in the absence of a contractual delivery date, the actual delivery date of the arrangement to the ship on or after 1 January 2028. • Pilot transfer arrangements installed before 1 January 2028 on ships to which SOLAS chapter I applies, (i.e. all ships engaged on international voyages unless expressly provided otherwise) are to be designed, manufactured, constructed, secured and installed in accordance with parts A, B and C of the performance standards, not later than the first annual, periodical or renewal safety equipment survey (as referred to in MSC.1/Circ.1290) after 1 January 2029. • Pilot transfer arrangements installed before 1 January 2028 on ships to which SOLAS Chapter I does not apply, are to be designed, manufactured, constructed, secured and installed in accordance with parts A, B and C of the performance standards, no later than 1 January 2030. **Related Instruments** • **MSC.576(110) - Performance standards for pilot transfer arrangements** • **MSC.1/Circ.1428/Rev.1 - Required pilot transfer arrangements for pilots and other personnel** • **MSC.577(110) - Amendments to the Code of Safety for Special Purpose Ships, 2008 (2008 SPS Code)** • **MSC.1/Circ.1690 - Voluntary early implementation of the amendments to SOLAS regulation V/23 on pilot transfer arrangements**
708 Adopted by **MSC.567(109)** Entry into force **1 January 2028**	**Amendments to the IGF Code - 2028** **Background:** The IGF Code is reviewed regularly. These amendments incorporate a number of consolidations and additional new provisions based on the industry's experience. **Implication:** **Owners and operators** of ships using natural gas as fuel should be aware that from 1 January 2028: • Vessels are permitted to have a suction well installed in fuel tanks protruding below the fuel tank without the well being considered part of the fuel tank in the context of damage requirements below the fuel tank. • Fuel tanks must be segregated from cargo in accordance with the requirements of the IMDG Code, where fuel tanks are regarded as bulk packaging, and a fuel tank on the open deck will be considered as a class 2.1 package. **Designers of ships** intending to use natural gas as fuel, constructed on or after 1 January 2028, and potential owners of the same, should be aware of the following: • Pressure relief valves discharging liquid or gas from piping systems must discharge into fuel tanks whenever the tank maximum allowable relief valve setting pressure is lower than the setting of the pressure relief valves fitted at fuel tank inlets and shall be designed to ensure that the required discharge capacity is met. Alternatively, they may discharge to the vent mast, if means are provided to detect and dispose of any liquid that may flow into the vent system.

	• Fuel tank inlets from safety relief valve discharge lines, protecting the piping system shall be provided with non-return valves in lieu of valves that are automatically operated when the safety system is activated. Safe means for tank isolation during maintenance shall be available without affecting proper operation of safety relief valves. • For the purposes of SOLAS regulation II-2/9 machinery spaces will be considered as fuel preparation rooms as opposed to any space containing equipment for the fuel preparation. • An Administration may allow a non-A-60 boundary to be installed facing the fuel tank on the open deck which is separated by a minimum distance through heat analysis to provide protection equivalent to an A-60 class division as well as intermediate structures providing heat protection will be accepted. • For oil tankers and chemical tankers, A-60 insulation, required by SOLAS regulation II-2/9.2.4.2.5, will be considered to meet the requirements regarding A-60 boundary provisions provided that the fuel tank is located in the cargo area forward of accommodation spaces, service spaces, control stations, escape routes and machinery spaces. Consideration for the protection of accommodation block sides may be necessary. • Notwithstanding the requirements for A-60 boundaries in the Code, where no source of gas release from the fuel containment system is considered possible, e.g. a type C tank in which tank connections are in a tank connection space, A-60 class shielding is not required. • The existing provision for the fuel storage hold space surrounding a type C tank to be considered a cofferdam in the context of protecting the fuel containment system from machinery spaces or other rooms with high fire risk are changed so that the hold space can only be considered a cofferdam when the minimum distance to the A-60 boundary from the outer surface of the insulation system of type C tank or the boundary of the tank connection space, if any, is not less than 900mm. In this context, for the vacuum insulated type C tank, outer surface of the insulation system means outer surface of the outer shell. • Hazardous areas zone 1 will not include fuel preparation room ventilation outlets and instead include ventilation outlets from zone 1 spaces. • The following area will be designated as a Hazardous area zone 1, areas on open deck, or semi-enclosed spaces on open deck above and in the vicinity of fuel tank vent mast outlet within a vertical cylinder of unlimited height and 6m radius centred upon the centre of the outlet, and within a hemisphere of 6m radius below the outlet. Where due to the size and layout of the vessel it is not possible to maintain the above distances, a reduced zone can be accepted based on a dispersion analysis, based on 50% LEL criteria. The zone dimensions shall never be less than 3m, and Application shall include a surrounding zone 2 hazardous area of 1.5m. • In lieu of areas within 1.5m surrounding open of semi-enclosed spaces , Hazardous area zone 2 includes spaces 4m beyond the cylinder and 4m beyond the hemisphere defined in the above hazardous area zone 1 area surrounding fuel tank vent masts on open or semi enclosed deck spaces. • Where the ventilation ducts serving hazardous spaces pass through less hazardous spaces, the ducts shall be gas-tight and have under-pressure relative to less hazardous or non-hazardous spaces. Ventilation pipes serving hazardous spaces that pass through non-hazardous spaces, and that are fully welded and designed in accordance with the requirements for materials section of the Code, are acceptable without the need for under-pressure. **Application:** The application of the amendments are included under each item. In general, they will apply to ships constructed on or after 1 January 2028 which use low-flashpoint or gas fuel, other than ships certified to the IGC Code. Otherwise, they apply to both new and existing ships using low-flashpoint or gas fuel. “Constructed on or after 1 January 2028” in this context means: • For which the building contract is placed on or after 1 January 2028; or • In the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 1 July 2028; or • The delivery of which is on or after 1 January 2032.

238

Adopted by
Cape Town Agreement, 2012 and Torremolinos Convention 1977 and Protocol of 1993 (SFV-P/CONF.1)

Not yet met entry into force criteria

International Convention for the Safety of Fishing Vessels (Torremolinos Convention) Cape Town Agreement

Background: The Torremolinos Convention and its 1993 Protocol have not yet entered into force as the entry into force requirements have not been met. There have also been some problems with the technical requirements. In order to address these issues, an agreement has been reached which changes the entry into force requirements to 22 States with an aggregate of 3,600 fishing vessels of 24m in length and over and modifies some of the technical provisions. As of 3 November 2025, twenty-five States have become party to the Agreement, but the aggregate number of vessels has not been met. The diplomatic conference in Cape Town, South Africa, in October 2012 agreed that the survey and certification requirements were amended to a five-year cycle. A phased-in application for some parts of the requirements for existing fishing vessels was also agreed.

Implication: **Shipowners and Ship Managers:** The Protocol has requirements covering the following areas:

- Construction, watertight integrity and equipment
- Stability and associated seaworthiness
- Machinery and electrical installations and periodically unattended machinery spaces
- Fire protection, detection, extinction and firefighting
- Protection of crew
- Life-saving appliances and arrangements
- Emergency procedures, musters and drills
- Radiocommunications
- Shipborne navigational equipment and arrangements

When it enters into force these safety items will need to be provided on board fishing vessels. Some of the requirements are applicable to existing fishing vessels as well as to new construction.

It should be noted that some flag Administrations have already enacted the Torremolinos Convention and Protocol, so fishing vessels flagged with these Administrations will find that nothing will change following entry into force of these amendments.

Shipbuilders / Designers of fishing vessels will need to ensure that the regulations are complied with. This may require additional or different safety equipment to be provided.
Flag Administrations and their Recognised Organisations will have to survey new and existing fishing vessels to the extent required and issue appropriate certification.

Application: The Torremolinos Convention and Protocol is, in general, applicable to fishing vessels of 24 metres in length and over.
Although the majority of the requirements are applicable only to new ships, the following are also applicable to existing ships:

- Life-saving appliances and arrangements - only regulation 13 ‘Radio life-saving appliances’ and regulation 14 ‘Radar transponders’
- Emergency procedures, musters and drills
- Radiocommunications

	• Shipborne navigational equipment and arrangements **Related Instruments** • **MSC.571(109) – Interim Guidance to assist in the implementation of the Cape Town Agreement of 2012**

Part 3

IMO and ILO requirements currently under development

This part covers requirements that are under discussion and have not been adopted and have no agreed entry into force date. This section is subject to change as discussions progress.

813

Predicted entry into force
1 September 2027

Draft Amendments to Appendix IX to MARPOL Annex VI to include reporting of the portion of the year for which data is submitted, and removal of 'oil' in oil- fired boilers

Background: The amendments to MARPOL Annex VI Appendix IX in MEPC.385(81) do not create a field for the portion of the year the report is made for both regulations 27 (Fuel oil consumption) and regulation 28 (Carbon Intensity).

These draft amendments correct this by introducing such date fields to Appendix IX.

Implication: There is no impact on clients expected as this is effectively a correction to ensure the portion of a year to which the data captured relates is correctly reported.

Application: All ships of 5000GT and above.

Related Instruments

- **MEPC.385(81) - Amendments to MARPOL Annex VI - Appendix IX - Accessibility of data and inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS)**

888

Predicted entry into force
1 September 2027

Draft Amendments to MARPOL Annex VI concerning an Emissions Control Areas for both NOx and SOx in the North-East Atlantic

Background: A requirement for a new Emissions Control Areas (ECA) for both NOx and SOx in the North-East Atlantic surrounding Greenland, Iceland, the Faroe Islands, the west coast of the UK and Ireland extending south to Spain and Portugal has been agreed.

The application relevant to NOx Tier III requirements is to ships which have a building contract placed on or after 1 January 2027, or in absence of contract, keel laying on or after 1 July 2027, or which are delivered on or after 1 January 2031, operating in the ECA .

Regarding SOx requirements, the application is to require ships operating in the ECA to use fuel oil with sulphur content not exceeding 0.10% m/m. The effective date for these requirements is expected to be 1 September 2028 which is 12 months after the expected entry into force of the MARPOL amendments i.e. to ships operating in the ECA from 1 September 2028.

Implication: **Shipowners and Operators of ships** which operate in the ECA will need to be aware of the requirements and the phase in dates for NOx and SOx respectively.

Application: The application relevant to NOx Tier III requirements is to ships with diesel engines with a power output of 130kW or greater operating in the ECA which have a building contract placed on or after 1 January 2027, or in absence of contract, keel laying on or after 1 July 2027, or which are delivered on or after 1 January 2031.

	Regarding SOx requirements, the application is to require ships operating in the ECA to use fuel oil with sulphur content not exceeding 0.10% m/m. The effective date for these requirements is expected to be 1 September 2028 which is 12 months after the expected entry into force of the MARPOL amendments i.e. to ships operating in the ECA from 1 September 2028.
896 Predicted entry into force **1 September 2027**	**Draft amendments to MARPOL Annex VI regulation 27 on DCS data access** **Background:** MEPC 83 approved draft amendments to MARPOL Annex VI, regulation 27, which will increase access to the IMO's Fuel Oil Data Collection System (DCS) for greater transparency. These amendments will give additional access to the DCS database as follows: • Full data access to the Recognised Organisations acting on behalf of an Administration of the ship. • Full data access for all ships to the Parties of MARPOL Annex VI with the provision that this is for analysis purposes. • Anonymised data to public user accounts i.e. so that the individual ships cannot be identified. **Implication:** There is no impact on clients expected as the requirements to ships on fuel oil consumption will not be affected. **Application:** This applies to member States, Recognised Organisations and those with public user accounts.
566 Predicted entry into force **1 January 2028**	**Draft amendments to the IP Code - mass of personnel to be used in stability calculation** **Background:** Following the adoption of the new SOLAS chapter XV (Safety measures for ships carrying industrial personnel) and the related new International Code of Safety for Ships Carrying Industrial Personnel (IP Code), IMO agreed to continue the work to further develop the IP Code. **Implication:** New draft amendments to Part IV/2 - *Subdivision and stability* have been finalised. They modify the mass for each industrial person to be used in stability calculations for cargo ships that carry more than 12 industrial personnel. It has been increased from 75kg to 90kg to provide a more realistic figure for those onboard and to align with the similar provision in the IP Code regulation V/2.2. **Application:** These changes were approved at MSC 110 with a view to adoption at MSC 111 and be applicable to new IP code ships (cargo ships and high-speed cargo craft, of 500GT and above, operating on international voyages): • for which the building contract is placed on or after 1 January 2028; or • in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 1 July 2028; or • the delivery of which is on or after 1 January 2032. **Related Instruments** • **MSC.521(106) - Amendments to the International Convention for the Safety of Life at Sea, 1974 (Chapter XV)** • **MSC.527(106) - International Code of Safety for Ships Carrying Industrial Personnel (IP Code)**

606

Predicted entry into force
1 January 2028

Draft amendments to SOLAS chapter V to introduce the VHF Data Exchange System (VDES)

Background: The Very High Frequency (VHF) Data Exchange System (VDES) integrates the functions of terrestrial and satellite VHF data exchange, Application Specific Message (ASM) and Automatic Identification System (AIS). VDES has additional capacity for the exchange of more digital data and could accommodate future growth in demand for the use of digital data in maritime radiocommunications.

Initially, there was a proposal to amend both SOLAS Chapters IV and V to introduce VDES. However, the IMO agreed to introduce VDES as an alternative to AIS under SOLAS Chapter V. It was decided that amendments to SOLAS Chapter IV should not be pursued at this stage, and proposals were invited for a future output to introduce VDES as communication equipment under SOLAS Chapter IV, if required.

Currently, the draft amendments to SOLAS Chapter V, the draft performance standards, any consequential amendments, and the draft guidelines have been finalised and approved to facilitate the widespread adoption of VDES, taking into consideration the potential substitution of the mandatory carriage requirement of AIS with the AIS component of VDES. The amendments are expected to be adopted at MSC 111 (May 2026).

Implication: **Ship owners and operators** should note proposed developments regarding VDES, a new communication tool. VDES will be an alternative to AIS.

Application: Its expected that the amendments to SOLAS Ch. IV will enter into force on 1 January 2028.

The requirements for AIS carriage in SOLAS V/19 apply to all ships of 300GT and upwards engaged on international voyages, cargo ships of 500GT and upwards not engaged on international voyages and passenger ships irrespective of size and consequently its expected that VDES will have the same application.

607

Predicted entry into force
1 January 2028

Draft amendments to the LSA code - Development of design and prototype test requirements for the arrangements used in the operational testing of free fall lifeboat release systems without launching the lifeboat

Background: Free-fall lifeboat release systems are typically tested without actually launching the free-fall lifeboat into the water, i.e. a simulated launching. Previous discussions at the IMO focused on amending existing paragraph 4.7.6.4 of the LSA Code, however, a new paragraph “4.7.7 Lifeboat release testing” was added rather than amending the existing provisions in paragraph 4.7.6.4.

The draft amendments require that for free-fall lifeboats the arrangement to test the release system under load without launching the lifeboat into the water, in accordance with paragraph 4.7.6.4. It is to be designed with a safety factor of at least 6 on the basis of the calculated maximum working load, with a full complement of persons and equipment, and the ultimate strength of the materials used for its construction considering static and relevant dynamic loads. Components of this arrangement that are exposed to the marine environment, other than falls and temporarily installed equipment, are to be constructed from materials that are corrosion resistant in the marine environment without the need for coatings or galvanising.

	Additionally, consequential draft amendments to the relevant IMO instruments have been approved as follows: • SOLAS chapter III, regulation 19 – *Emergency training and drills* : Changing the footnote reference for paragraph 3.4.4 from referring to "Measures to prevent accidents with lifeboats (MSC.1/Circ.1206 /Rev.1)", to instead referring to the "Revised guidelines on safety during abandon ship drills using lifeboats (MSC.1/Circ.1578/Rev.1)". • Resolution MSC.402(96) - *Requirements for Maintenance, Thorough Examination, Operational Testing, Overhaul and Repair of .Lifeboats and Rescue Boats, Launching Appliances and Release Gear* : The draft amendments introduce a requirement in paragraph 6.2 – *Annual thorough examination and operational test*, for free-fall lifeboats to have an arrangement to test the release system under load without launching the lifeboat into the water. In addition, in order to reference the new paragraph 4.7.7 of the LSA Code, draft amendments were made to paragraph 6.2.7 on the method to carry out the operational testing of the free-fall lifeboat release function. • Resolution MSC.81(70) *Revised Recommendation on Testing of Life-Saving Appliances* :The draft amendments are included in Part 1, paragraph 6.9 – *Release mechanism test* and Part 2, paragraph 6.1 – *Launching appliances using falls and winches*, and ensure that arrangements to test the release system under load without launching the free-fall lifeboat into the water conform to the amended prototype, production and installation tests. **Implication:** **Ship owners, operators and lifeboat manufacturers** are advised to monitor forthcoming new paragraph 4.7.7 of the LSA Code, SOLAS chapter III Regulation 19, paragraph 6.2.7 resolution MSC.402(96) and various relevant MSC circulars, and remain informed about the most recent requirements. **Application:** The draft amendments are expected to apply to free-fall lifeboats installed on or after 1 January 2031, where the expression "*installed on or after 1 January 2031*" means: **(New Ships)** for ships for which the building contract is placed on or after 1 January 2031, or in the absence of the contract, constructed on or after 1 January 2031, any installation date on the ship; or **(Existing Ships)** for ships other than new ships described above, when there is a contractual delivery date for the equipment or, in the absence of a contractual delivery date, the actual delivery date of the equipment to the ship on or after 1 January 2031.
719 Predicted entry into force **1 January 2028**	**Draft amendments to the ESP Code - Remote Inspection Techniques** **Background:** The IMO has finalised amendments to include remote inspection techniques (RIT), as an alternative means for close-up survey of the structure of ships. RIT is defined as: "a means of survey of any parts of the structure without the need for direct physical access of the surveyor." **Implication:** The main changes introduced in the code cover (but are not limited to): • How RIT surveys are to be carried out; • For periodic surveys after the third special survey, the use of RIT is subject to the agreement of the Administration;

	• A traditional survey will need to take place if the RIT reveals damage or deterioration that the surveyor judges will require attention or further investigation; • Actions to be taken by the crew in preparation for the survey (cleanliness of spaces etc.); • In preparation for the survey programme, details of the RIT equipment and its use is to be included; • Inclusion of the RIT firm in the survey planning meeting (prior to commencing the survey); • Principles and procedures for Administrations to certify RIT firms. **Application:** The draft amendments are expected to be applicable to surveys of bulk carriers and oil tankers of 500GT, and above, to which the ESP Code applies. It is anticipated that the draft amendments will enter into force on 1 January 2028.
728 Predicted entry into force **1 January 2028**	**Draft amendment to the 1988 Load Line Protocol, regulation 25 - protection of the crew - setting of guard rails on the deck structure** **Background:** It has been observed that when ships are subject to intense weather conditions, the crew that operate on open decks are likely to fall through the gaps of guard rails. The draft amendments to regulation 25 of the 1988 Load Line Protocol have the objective to ensure the safety of crew is enhanced to avoid such accidents. **Implication:** The amendments will require that guard rails or bulwarks are to be fitted around all exposed decks and all exposed sea access holes (such as edges of moonpools) accessible to the crew during navigation. The height of the bulwarks or guard rails shall be at least 1m above the deck. If this height interferes with the normal operation of the ship, the Administration can approve a lower height. If required for the normal operation of the ship, chains can be fitted between two fixed stanchions (and/or bulwarks) provided that they are tightened as much as reasonably practicable and are detachable. **Application:** These changes are expected to impact all new ships of 24m or more in length that engage on international voyages, of which the keels are laid, or which are at a similar stage of construction on or after 1 January 2028.
734 Predicted entry into force **1 January 2028**	**Draft amendments to MARPOL Annex V on reporting the exceptional discharges or accidental loss of fishing gear** **Background:** Fishing gear may be lost or discarded at sea, adding to the growing quantity of plastic waste at sea and on beaches. As part of the IMO's action plan to address marine plastic litter work is being undertaken to address marine plastic pollution from lost or discarded fishing gear. This is likely to include amendments to MARPOL Annex V (Prevention of Pollution by Garbage) whilst minimising duplication and gaps in the existing regulatory framework.

	Implication: Fishing vessel operators and crews are likely to need to report lost or discharged fishing gear to the flag State, which should then report to the coastal State. **Application:** Fishing vessels, excluding recreational vessels. Recreational vessels are proposed to be defined as "ships used for sport or pleasure which are not used for commercial purposes or activities". At this stage its unclear when any new requirements will enter force however it could be in 2028.
807 Predicted entry into force **1 January 2028**	**Draft amendments to the International Maritime Dangerous Goods (IMDG) Code (Amendment 43-26)** **Background:** The IMDG Code is regularly reviewed to take into account new requirements for existing substances, or add new substances. **Implication:** The latest set of draft amendment (43-26) include the following (but not limited to) notable proposed amendments: The draft amendments include, but are not limited to: • General editorial updates • Updates to Column 17 - *Properties and observations* of the Dangerous Goods List in the IMDG Code to include examples of properties that would be useful to crews to use for each specific listed class of dangerous goods (all classes, class 1, class 2 etc.) • Updates to align the IMDG Code with the latest version of amendments to the UN Recommendations on the Transport of Dangerous Goods New entries in the Dangerous Goods List: • UN 2348 - BUTYL ACRYLATES, STABILIZED • UN 2862 - VANADIUM PENTOXIDE, non-fused form, containing not less than 10 % respirable particles • UN 3561 - CHLOROPHENOLS, CORROSIVE, TOXIC, SOLID, N.O.S. • UN 3562 - CHLOROPHENOLS, CORROSIVE, SOLID, N.O.S. • UN 3563 - LITHIUM METAL BATTERIES INSTALLED IN CARGO TRANSPORT UNIT • UN 3564 - SODIUM ION BATTERIES INSTALLED IN CARGO TRANSPORT UNIT New Special Provisions: • SP410 - applicable to hybrid batteries containing both lithium ion cells and sodium ion cells • SP411 - applicable to magnetic resonance imaging (MRI) scanners containing non-flammable, non-toxic gas • SP412 - entries for which this SP applies, may contain not more than 12% by mass of dimethyl ether • SP413 - entries for which this SP applies, may only be transported under specific conditions • SP980 - transport provisions for vehicles, not applicable to vehicles driven by passengers on ro-ros passenger ships, it introduces requirements to the consignor which will need to assess the safety condition of vehicles prior the transport. Batteries subject to SP376 (damaged lithium ion cells or batteries and lithium metal cells or batteries) will need to be removed. • New requirements for design, construction, inspection and testing of FRP service equipment for portable tanks. • A number of amendments to Special Provisions (SP)

	New entries in the Index: • UN 3561 - CHLOROPHENOLS, CORROSIVE, TOXIC, SOLID, N.O.S.UN 3562 - CHLOROPHENOLS, CORROSIVE, SOLID, N.O.S. • UN 2857 - HEATING MACHINES containing non-flammable, nontoxic, gases or ammonia solutions (UN 2672) • UN 3358 - HEATING MACHINES containing flammable, non-toxic, liquefied gas • UN 3538 - Magnetic resonance imaging (MRI) scanners containing non-flammable, non-toxic gas • UN 3563 - LITHIUM METAL BATTERIES INSTALLED IN CARGO TRANSPORT UNITUN 3564 - SODIUM ION BATTERIES INSTALLED IN CARGO TRANSPORT UNIT Other notable amendments: • Amendments to table 7.1.4.5.18 - Class 7 – *Radioactive material Segregation table for persons* of the IMDG Code to incorporate metre-based segregation distances. • Although not fully supported as a IMDG Code change, draft amendments to UN 1202 - DIESEL FUEL or GAS OIL or HEATING OIL, LIGHT, to prevent reclassification in port areas where classification between different modes of transport is not the same, will be sent to UNTDG to amend the UN model regulations. • Amendments to existing SP961 to clarify which exceptions do not apply to lithium-ion battery powered EVs and hybrid EVs. • Amendments to existing SP962 to clarify the requirements for the placarding of CTUs carrying packaged and/or unpackaged vehicles. • Deletion of SP 404 as well as its assignment to UN No. 3558 as duplication of SP 961.6. It is expected that draft amendment 43-26 to the IMDG Code will be adopted at MSC 111. **Application:** The IMDG Code applies to all ships engaged in international trade and to cargo ships even if smaller than 500GT, which are carrying any of the substances, materials and articles covered by the IMDG Code (dangerous goods as defined in SOLAS chapter VII - regulation 1). Amendment 43-26 is expected to be applied voluntarily from 1 January 2027 pending its expected official entry into force on 1 January 2028. **Related Instruments** • **MSC.1/Circ.1588/Rev.[4] - Revised emergency response procedures for ships carrying dangerous goods (EmS Guide)**
885 Predicted entry into force **1 January 2028**	## Work Plan for regulatory framework on OCCS **Background:** MEPC approved a work plan on the development of a regulatory framework for the use of onboard carbon capture and storage (OCCS) with the exception of matters related to accounting of CO_2 captured on board ships. This workstream has the goal of developing a regulatory framework for the use of OCCS, in order to reduce net GHG emissions from ships without negatively affecting the environment.

	The objectives of this work stream are: • Avoiding emissions to air and discharges to sea that are harmful to the environment and ensuring traceability of the captured carbon. • Consideration of legal barriers that may hinder the use of OCCS and transportation and transfer of the captured carbon to safe permanent storage or utilisation. • Facilitation of access to certified reception facilities for the value chain for permanent storage or utilisation of captured carbon. • Enabling recording and reporting of relevant data. • Developing options that take into account GHG emission reductions from onboard carbon capture in the IMO GHG regulatory framework. This work plan sets out an aim to complete the work in 2028, and priority tasks as soon as possible, where tasks associated with its first objective (Avoiding emissions to air and discharges) will be prioritised. **Implication:** Those considering the use of OCCS should keep themselves updated on the progress of these new requirements. **Application:** The application of this regulatory framework is to be determined during the the work, however it is expected to apply to all installations of OCCS.
906 Predicted entry into force **1 January 2028**	**Draft amendment to SOLAS regulation IV/5 (Provision of Radiocommunication Services), SOLAS regulation V/4 (Navigation Warnings) and SOLAS regulations V/5 (meteorological services and warnings)** **Background:** The IMO has reviewed key developments in the Global Maritime Distress and Safety System (GMDSS), with particular emphasis on the dissemination of Maritime Safety Information (MSI). As part of this, IMO has now approved draft amendments, requiring coastal States to use all operational Recognised Mobile Satellite Services (RMSSs) for the dissemination of MSI and SAR (Search and Rescue) related information via the Enhanced Group Call Service. Further amendments to SOLAS Ch. V (V/4 – *Navigational warnings* and V/5 – *Meteorological services and warnings*) cross reference to the new provision (draft regulation IV/5.3). Additionally, MSC.509(105) Rev.1 – *Provision of radio services for the Global Maritime Distress and Safety System* has been amended to include a new Annex 6, which outlines the *Criteria for use when providing an international Enhanced Group Call service in the GMDSS*. **Implication:** The obligation is on governments to comply. Ship operators will receive the information transmitted by governments. **Application:** The proposed amendments are expected to enter into force on 1 January 2028 and apply to contracting governments to SOLAS.

934

Predicted entry into force
1 January 2028

Draft amendments to the IMSBC Code (09-27)

Background: The IMSBC Code is regularly reviewed to take account of new requirements for existing substances or new substances. These amendments have been published as Amendment 09-27.

Implication: Amendments to the Bulk Cargo Identification Numbers in the IMSBC Code will be discussed by E&T 44 alongside several new schedules, as well as other related updates which were agreed in principle for further discussion and finalisation.

New draft schedules:

- BITUMINOUS GRANULATES COARSE
- BITUMINOUS GRANULATES FINES
- UNTREATED INCINERATOR BOTTOM ASH (U-IBA)
- CONTAMINATED SOIL PFAS
- CALCIUM CARBONATE, LIME MUD
- MULLITE
- KAOLINITE

Application: The amendments are applicable to all ships (including cargo ships of less than 500GT) carrying solid bulk cargos and are expected to be available for use voluntarily (subject to the flag State's agreement) from 1 January 2028 and will be mandatory from 1 January 2029.

613

Predicted entry into force
1 March 2028

Draft IMO Net-Zero Framework

Background: The IMO has agreed a reduction pathway for GHG emissions from the shipping industry to align with the Paris Agreement climate target to limit the increase in the global temperature to 1.5°C, relative to pre-industrial levels.

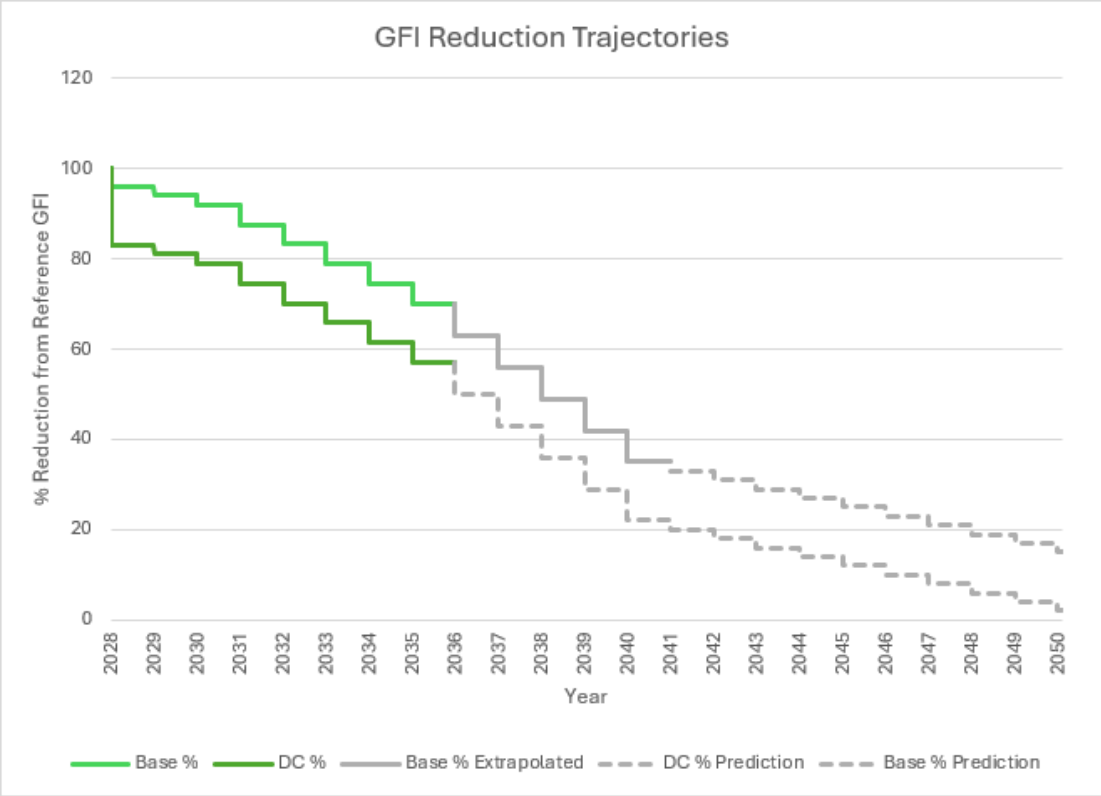
In this context, the IMO adopted the *2023 IMO Strategy on Reduction of GHG Emissions from Ships* which includes GHG emission reduction indicative checkpoints of 20% striving for 30% (by 2030) and 70% striving for 80% (by 2040) compared to 2008 levels and an overall target of reaching net-zero by or around 2050.

During MEPC 83 in April 2025 the IMO 'approved' draft amendments to MARPOL Annex VI to introduce a new chapter 5 of that Annex entitled 'Regulations on the IMO Net-Zero Framework'. These were expected to be adopted by an extraordinary session of MEPC in October 2025 for an entry into force date of 1 March 2027. However, during that session there was a vote to adjourn the meeting for a year and the future of the draft regulatory framework is currently unclear. If the framework is adopted in Autumn 2026 at the resumption of the extraordinary session the regulations would enter force in early 2028.

This regulatory framework introduces a mandatory requirement for ships to assess their Greenhouse Gas (GHG) emissions energy intensity (GFI) i.e. the amount of GHG emissions from the ship per unit energy consumed measured in grams of CO_2 equivalent per MJ (gCO_2/MJ) over a calendar year. In

this context, the 'equivalent' refers to the GHG emissions in scope of this new regulatory framework where Carbon Dioxide (CO_2) Methane (CH4) and Nitrous Oxide (N_2O) are all calculated into an equivalent amount of CO_2.

The regulations introduce two targets that a ship will be assessed against, a base target (aligned with the base checkpoints in the 2023 IMO Strategy on Reduction of GHG Emissions from Ships) and a direct compliance target (aligned with the striving for checkpoints in the Strategy).



Graph 1 – Reduction trajectories for the two targets (Base and Direct Compliance) set in the regulations

A ship which obtains a GFI equal or lower to the direct compliance target will not need to take further action and will be credited with surplus units equal to the difference between the direct compliance target and the ship's attained GFI.

A ship which has a GFI greater than the direct compliance target will experience 'Tier 1' deficit which must be balanced by purchasing remedial units at a rate of US$100/tonne CO_2 equivalent.

A ship which has a GFI greater than the base target will experience both 'Tier 1' deficit which must be balanced as above and in addition 'Tier 2' deficit which must be balanced by purchasing remedial units at a rate of US$380/ tonne CO_2 equivalent, or obtain surplus units from an over compliant ship,

	or use 'banked' surplus units from a previous year. Surplus units banked are valid in the year they are credited to the ship and for a further 2 years before they expire. For full details on the approved regulatory framework see the LR MEPC 83 Summary Report. **Implication:** The measures will have significant impact on both capital and operational expenditure while providing a platform to encourage the shipping industry to develop and adopt efficient and zero-emission ships and/or fuels to enable the transition at every level of the shipping industry. **Shipowners and operators** of ships in scope of the regulations should, at an early stage, conduct an assessment of their fleet and model differing scenarios for differing fuel choices. LR Advisory Energy Transition team can assist in this activity. Connect with them here: **Energy Transition | LR**. **Application:** The regulations apply to all ships of 5,000GT or more with the exception of: • Ships operating solely within the waters of their flag State where the flag State is encouraged to make equivalent arrangements. • Ships not propelled by mechanical means. • Platforms including FPSOs and FSUs. • Drilling rigs. • Semi-submersible vessels. The regulations call for a review which will, *inter alia*, re-consider the application with potential for the tonnage threshold to be to applied in the regulations to all ships of 400GT and above, as well as potentially removing the exception for semi-submersible vessels. This review is expected to happen 5 years after the regulations enter into force. **Further Information** For further information please see the recording of LR's webinars on the outcome of MEPC 83 and MEPC ES.2 as well as the LR MEPC 83 Summary Report. **How LR Can Support Clients** LR's advisory services can assist owners and operators in assessing their fleet and preparing for compliance: **Energy Transition | LR**.
378 Predicted entry into force **1 April 2028**	**Draft amendments to appendix II (Form of the IOPP certificate and Supplements) and Appendix III (Form of Oil Record Book) of MARPOL Annex I** **Background:** The IMO has agreed a draft MEPC circular on *Guidelines for systems for handling oily wastes in machinery spaces of ships incorporating guidance notes for an integrated bilge water treatment system (IBTS)*, draft amendments to Appendix II (Form of the IOPP certificate and

	Supplements) and Appendix III (Form of Oil Record Book) of MARPOL Annex I, and the draft revised MEPC circular on Guidance for the recording of operations in the Oil Record Book Part I – machinery space operations (all ships). At the time these instruments were considered for approval, the IMO discussed the use of forced evaporation of oily bilge water and if this is an accepted means of disposal. It was agreed that such forced evaporation is, in principle, an acceptable means of disposal of oily bilge water and invited proposals to amend MARPOL Annex I to implement this acceptance. Proposals to amend MARPOL Annex I are expected to be considered at PPR 13 in February 2026. **Implication:** On completion of this work, regulatory certainty will be provided to the use of forced evaporation of oily bilge water. The draft IBTS Guidelines are expected to give information to support the mandatory requirements applicable to handling of oily bilge water and oily residues (sludge). The draft revised *Guidance for recording of operations in the Oil Record Book Part I* – Machinery space operations (all ships) are intended to facilitate compliance with MARPOL requirements by providing advice to crews on how to record the various operations and the amendments focus on alternative methods of disposal. The draft amendments to Appendix II and III of Annex I introduce the ability to record alternative methods of disposal of oily bilge water which is expected to clarify the ability to use forced evaporation. **Application:** All oil tankers of 150GT or above and all other ships of 400GT or above engaged on international voyages.
750 Predicted entry into force **1 June 2028**	**Review of the Ballast Water Management Convention** **Background:** Following the approval of circular *BWM.2/Circ.79 Convention Review Plan (CRP) under the experience-building phase associated with the BWM Convention*, MEPC 81 endorsed a list of instruments which require revision and or development as part of the review of the BWM Convention. Work is now proceeding to develop the draft text for a package of amendments to the Convention and its associated guidance. **Implication:** Clients should anticipate amendments to the Ballast Water Management Convention and as a result may need to make changes to how the requirements for compliance with the BWM Convention are met. In particular it is anticipated that amendments will be made to the following sections of the Ballast Water Management Convention: • Regulation A-3 (Exceptions) - to legally enable the use of contingency measures and challenging water guidance, taking into account the guidelines and guidance developed by the IMO; - to allow circumstances when the ship will discharge unmanaged or partially managed ballast water and sediments on the high seas, taking into account the guidelines and guidance developed by the IMO, due to the ship:

- experiencing challenging water quality at uptake resulting in bypass of its BWMS; and/or
- applying contingency measures due to BWMS failure; and/or
- needing to comply with any port State requirement for ballast water exchange plus treatment.

- Regulation B-1 (Ballast Water Management Plans),
  - Identifying ships with BWMS that are type approved in accordance with the BWMS Code, as opposed to older versions of the Guidelines (G8);
  - Reflecting any important updates made to the standard format of the BWMP (appendix to the Guidelines (G4)) to standardise and improve consistency;
  - Adding a new requirement that ships plan for contingency measures, taking into account BWM.2/Circ.62 (Guidance on contingency measures under the BWM Convention);
  - Adding a new requirement that the BWMPs include a plan for safe ballast water exchange, including partially treated and/or non-neutralised ballast water;
  - Requiring that the BWMP provides the maintenance procedures necessary to keep any BWMS installed in good working order;
  - Adding a new requirement that the BWMP include a maintenance schedule that reflects the OEM manual and maintenance schedule; and
  - Including the practice of temporary storage of grey water and/or treated sewage in ballast water tanks.
- Regulation B-2 (Ballast Water Record Book)
  - Adding a new requirement that a BWMS maintenance log be added to the BWRB, reflecting the OEM manual and maintenance schedule, and be kept updated and signed by crew involved in each action.
- Regulation B-6 (Duties of officers and crew)
  - Adding a new requirement for crew familiarisation/training with regard to the BWMS and how it should be documented/verified.
- Regulation D-2 (Ballast Water Performance Standard)
  - Requiring the Maximum Allowable Discharge Concentration (MADC) for BWMS that use active substances, to ensure that in-service ships regularly discharge effectively neutralised ballast water, for BWMS utilising active substances, in line with the limit set as part of the Final Approval of the BWMS.
- Regulation D-3 (Approval Requirements for ballast water management systems)
  - Creating a new requirement that any type-approved BWMS installed on a ship to meet the D-2 standard shall be maintained in good working order; and
  - Creating a new requirement that during type approval BWMS should be verified to not exceed MADC, to ensure that in-service ships regularly discharge effectively neutralised ballast water for BWMS that use active substances.
- Regulation E-1 (Surveys)
  - Requiring that annual surveys confirm required maintenance has been undertaken by verifying the Ballast Water Record Book (BWRB), including the ballast water maintenance log;
  - Requiring a biological efficacy test (sampling and analysis) to be undertaken as part of intermediate and renewal surveys;
  - Creating a new requirement to undertake annual sampling of residual active substances;
  - Including testing in line with BWM.2/Circ.70/Rev.1 as part of the renewal and/or intermediate survey;
  - Requiring items such as time-bound repair plans, destination State approvals, flag State approvals (dispensation), etc.
- Appendix I - (Form of International Ballast Water Management Certificate)
  - Amending appendix I to include a supplement with additional information in line with the approach of the IOPP Certificate.

In addition clients should also anticipate amendments to:

- MEPC.300(72) Code for Approval of Ballast Water Management Systems (BWMS Code)MEPC.173(58) Guidelines for ballast water sampling (G2),
- MEPC.173(58) *Guidelines for ballast water sampling (G2),*
- MEPC.370(80) *Guidelines for ballast water management and development of Ballast Water Management Plans (G4),*
- MEPC.169(57) *Procedure for approval of ballast water management systems that make use of Active substances (G9),*
- MEPC.252(67) *Guidelines for port State control under the BWM Convention*
- BWM.2/Circ.42/Rev.2 *Guidance on ballast water sampling and analysis for trial use in accordance with the BWM Convention and Guidelines (G2)*
- BWM.2/Circ.43/Rev.1 *Guidance for Administrations on the type approval process for ballast water management systems*
- BWM.2/Circ.62 *Guidance on contingency measures under the BWM Convention*
- BWM.2/Circ.69 *Guidance on System Design Limitations of ballast water management systems and their monitoring*
- BWM.2/Circ.70/Rev.1 *2020 Guidance for the commissioning testing of ballast water management systems*

Finally clients should also expect the development of new guidance covering:

- The operation and maintenance of the BWMS,
- A review process of type approvals for BWMS that do not use active substances,
- Type approving BWMS which have undergone modifications since receiving type approval,
- Information to be included in BWMS Operation Maintenance and Safety Manual (OMSM).

Work is ongoing to develop the amendments to the relevant instruments of the Convention, with the expectation that the amendments should be ready for adoption at MEPC 85 (Autumn 2026) and entry into force in 2028.

Application: The Convention applies to all ships and offshore structures (i.e. vessels of any type operating in the aquatic environment, including submersibles, floating craft, floating platforms, floating storage units (FSUs) and floating production, storage and offloading (FPSO) units) that load and discharge ballast.

Further Information

Ballast water management

How LR Can Support Clients

Because we understand the pressures you face, the operational challenges you have to overcome and the intricacies of the compliance standards you have to meet, our services are tailored to your needs.

- Preparation and approval of Ballast Water Management Plans
- BWMS commissioning testing
- Model Ballast Water Record Books
- Approval of installation of Ballast Water Treatment Systems on LR Classed Ships

528

Predicted entry into force
1 July 2028

Draft amendments to the IGC Code - 2028 version

Background: The IGC Code is regularly under development with the industry learning from new technologies, accidents, research and practices in order to stay as up to date as possible. These amendments include numerous consolidations from Unified Interpretations alongside new requirements.

Implication: The following non-exhaustive list of amendments/clarifications to the 2014 IGC Code have been adopted. The amendments include:

- Application of finite element analysis to type C tanks;
- Carriage of CO_2 cargoes and the use of LPG and toxic cargoes as fuel;
- The causes, and effects of an ESD (Emergency Shut down);
- Cargo tank filling limits; and
- Ethane was added to chapter 16 as a cargo to be used as fuel.

In addition, the draft amendments to the IGC Code incorporate the requirements of a number of unified interpretations on the IGC Code which will remain in effect for existing ships constructed prior to the entry into force.

- MSC.1/Circ.1543 - *Unified Interpretation relating to the IGC Code*
- MSC.1/Circ.1559 - *Unified Interpretations of the IGC Code*
- MSC.1/Circ.1590 - *Unified Interpretation of Paragraph 13.3.5 of the IGC Code*
- MSC.1/Circ.1606 - *Unified Interpretation of Paragraph 13.3.5 of the IGC Code*
- MSC.1/Circ.1617 - *Unified Interpretation relating to the IGC Code*
- MSC.1/Circ.1625 - *Unified Interpretations relating to the IGC Code*
- MSC.1/Circ.1651 - *Amendments to MSC.1/Circ.1625 on Unified Interpretations of the IGC Code*
- MSC.1/Circ.1669 - *Unified Interpretation of the IGC Code*
- MSC.1/Circ.1679 - *Interim Guidelines for Use of Liquefied Petroleum Gas (LPG) Cargo as Fuel.*

Application: Applies to gas carriers regardless of their size, including those of less than 500GT, engaged in the carriage of liquefied gases having a vapour pressure exceeding 0.28 MPa absolute at a temperature of 37.8°C and other products as listed in Chapter 19 of the IGC code, when carried in bulk.

As the list of amendments is extensive, some amendments are applicable to ships constructed on or after 1 July 2028 and others will apply to both new and existing ships.

In general, amendments that require changes in design or construction are applicable to ships constructed on or after 1 July 2028. Amendments of an operational nature are applicable to new ships, and to existing ships under the 2014 IGC Code (Ships constructed on or after 1 July 2016). Editorial amendments that do not change the intent of the requirements are applicable to new and existing ships. Amendments are not applicable to those ships constructed before 1 July 2016, however, individual member States may take their own view.

The amendments will enter into force on 1 July 2028.

834

Predicted entry into force
1 July 2028

Draft amendments to SOLAS II-1 in relation to the application of the IGF Code to confirm gaseous fuels are within its scope.

Background: There is ambiguity in the application of the IGF Code in relation to fuels such as ammonia which do not have a flashpoint. It was established that many fuels that are considered within the application of the IGF Code do not have a flashpoint that can be measured using the closed cup method as they are in a gas state in the temperature range applicable to the closed cup test. This is the method of determining flashpoint in the context of SOLAS.

Accordingly, a new definition of gaseous fuel has been introduced which captures fuels that are in a gaseous state in the temperature range used for the closed cup test, therefore confirming that the various fuels (which previously were considered as low flashpoint fuels) are in scope of the IGF Code.

Draft amendments to SOLAS will:

- Introduce a definition of gaseous fuel being that which has a vapour pressure exceeding 0.28 MPa absolute at a temperature of 37.8 degrees Celsius or is completely gaseous at 20 degrees Celsius at a pressure of 101.3 kPa.
- Introduce consistent use of the terms gaseous fuel in addition to low-flashpoint fuels in the context of Part G of SOLAS Chapter II-1.

Implication: There should be minimal or no impact as the amendments clarify the current understanding of the industry.

Application: The amendments confirm that the IGF Code applies to ships using gaseous fuels in addition to low-flashpoint fuels. The exception is that the IGF code does not apply to gas carriers using non-cargo gaseous fuels as fuel where the design and arrangement for such gaseous fuels complies with the IGC Code. However, MSC 110 confirmed that the IMO will work on further amending SOLAS to reflect scenarios where gas carriers use non-cargo gas, which is not within chapter 19 of the IGC Code, as fuel and how the IGF Code will apply in such scenarios.

917

Predicted entry into force
1 July 2028

Draft amendments to IGF Code (related to draft amendments to SOLAS regulation II-1/2)

Background: These amendments to the IGF Code are in relation to the 'tidy up' work the IMO has done in SOLAS Chapter II-1 in recognising many fuels, including arguably LNG, are not actually a 'low flashpoint' fuel as defined in SOLAS and are gas fuels. These amendments to SOLAS are expected to be adopted at MSC 112 in 2026 for entry into force in 2028.

These consequential amendments to the IGF Code align the Code with the underpinning SOLAS amendments related to defining a gas. They are expected to be adopted along with the underpinning SOLAS amendments.

Implication: There are no impacts expected as the amendments facilitate the status quo with greater clarity.

Application: Ships to which the IGF Code applies.

828

Predicted entry into force
1 January 2030

Review of the Short-Term GHG Reduction Measure (CII and EEXI)

Background: MARPOL Annex VI regulation 28.11 required a review of the CII framework and possible additional EEXI requirements by 1 January 2026.

This work is being conducted in two phases. MEPC 83 concluded the review with the following tasks being finished in Phase 1:

- Agreement of reduction 'Z' factors for CII between 2027 and 2030.
- To provide greater transparency of the IMO DCS data, including CII ratings.

MEPC 83 agreed a work plan which will consider further challenges in the short-term measure beyond 2026 in Phase 2 as follows:

2026 (MEPC 84):

- Finalise development of an enhanced SEEMP framework.
- Finalise the cgHRS metric for cruise passenger ships which uses hours for the measure of transport work.
- Consider proposals to ensure synergies between the IMO carbon intensity/energy efficiency framework and the IMO Net-Zero Framework (e.g. energy-based approach) with a view to finalisation as soon as possible.

2026 (MEPC 85):

- Consider the development of other CII metrics.
- Consider proposals to ensure synergies between the IMO carbon intensity/energy efficiency framework and the IMO Net-Zero Framework (e.g. energy-based approach) with a view to finalisation as soon as possible.

2027 (MEPC 86):

- Consider the development of other CII metrics.
- Consider further proposals for CII correction factors and/or reference line adjustments.
- Consider proposals to ensure synergies between the IMO carbon intensity/energy efficiency framework and the IMO Net-Zero Framework (e.g. energy-based approach) with a view to finalisation as soon as possible.

2028 (MEPC 87):

- Conclude consideration of other CII metrics.
- Finalise the development of revised reference lines, as appropriate.
- Consider further proposals for CII correction factors and/or reference line adjustments, as appropriate.
- Finalise Phase 2 of the review.
- Consider proposals to ensure synergies between the IMO carbon intensity/energy efficiency framework and the IMO Net-Zero Framework and develop a possible way forward for the IMO carbon intensity/energy efficiency framework beyond 2030, as appropriate.

	The output from this package of work will result in amendments to various Guidelines used to support the CII regulations as well as potential MARPOL Annex VI amendments. Amendments to Guidelines will take effect after their approval, whereas it is anticipated that MARPOL Annex VI amendments will not come into force until 2028 at the earliest. **Implication:** **Shipowners and Operators** of ships in scope of the CII regulations should be aware that the following reduction 'Z' factors were agreed: **2027:** 13.625 **2028:** 16.25 **2029:** 18.875 **2030:** 21.5 These will have significant impact on the required CII with these figures acting as percentage reductions on the 2019 baseline for CII. **Application:** To ships of 5000GT and over falling into one of the following categories: • Bulk Carrier • Combination Carrier • Container Ship • Cruise Passenger Ship • Gas Carrier • General Cargo Ship • LNG Carrier • Refrigerated Cargo Carrier • Ro-ro Cargo Ship • Ro-ro Cargo ship (vehicle carrier) • Ro-ro Passenger Ship • Tanker **How LR Can Support Clients** LR will continue to keep clients up to date on developments of the short-term GHG measure review and any actions that need to be taken including when the method for calculating CII may change or where new correction factors are introduced etc. With regard to meeting the CII requirements beyond 2026, LR's advisory services can assist in preparing for compliance **GHG Regulation Compliance & Optimisation | LR**
637 Predicted entry into force **1 June 2031**	**Draft amendments to MARPOL Annex IV for the Prevention of Pollution by Sewage from Ships -** **Background:** It has been noted that 97% of ships tested did not meet sewage effluent discharge standards despite using approved Sewage Treatment Plants (STP), with poor performance or failure being common causes. It is anticipated that regular maintenance of STP, monitoring of STP effluent and strengthening the STP type approval test process can help reduce such poor performance and failures.

	Implication: It's possible that revised standards for the maintenance of STPs and monitoring of effluent will be published. **Application:** Ships of 400GT and above, and ships of less than 400GT certified to carry more than 15 persons. **Related Instruments** • **MEPC.227(64) - 2012 Guidelines on implementation of effluent standards and performance tests for sewage treatment plants**
572 Predicted entry into force **1 July 2031**	**Comprehensive Review of the 1978 STCW Convention and Code** **Background:** The Comprehensive Review of the STCW Convention and Code is in two broad stages: 1. Review which is a gap analysis, and 2. Revision. The Review stage has been completed, identifying over 500 gaps that require further consideration. The Revision stage will now commence proposing and agreeing amendments to fill the gaps identified where necessary. **Implication:** Clients will need to be aware of the amendments to the STCW Convention and Code when they are finalised as it may revise existing training requirements for seafarers or introduce new requirements. **Application:** A revised roadmap for the comprehensive review has been agreed which indicates that the amendments to the Convention will be adopted in 2029 or 2030, indicating that the new requirements could enter force in 2031 or 2032. This brings the conclusion forward by at least a year.
497 Predicted entry into force **1 January 2032**	**Draft Code for Maritime Autonomous Surface Ships** **Background:** The IMO completed the Regulatory Scoping Exercise (RSE) in relation to the use of Maritime Autonomous Surface Ships (MASS) aimed to establish a set of common gaps and themes and identify the most appropriate way of addressing MASS operations within such instruments. For the purpose of the RSE, MASS was defined as a ship, which to a varying degree can operate independently of human interaction. Four 'degrees of autonomy' for the RSE's purpose were identified as: • Degree One: Ship with automated processes and decision support • Degree Two: Remotely controlled ship with seafarers on board • Degree Three: Remotely controlled ship without seafarers on board • Degree Four: Fully autonomous ship The outcome of the RSE can be found in detail in: • MSC.1/Circ.1638 Outcome of the Regulatory Scoping Exercise for the use of Maritime Autonomous Surface Ships (MASS);

- LEG.1/Circ.11 Outcome of the Regulatory Scoping Exercise and Gap Analysis of Conventions emanating from the Legal Committee with respect to MASS; and
- FAL.5/Circ.49 Outcome of the regulatory scoping exercise and gap analysis of the FAL Convention with respect to MASS.

As a result, the IMO has been working on the following tasks:

- To develop a non-mandatory goal-based MASS Code, which is expected to be effective from MSC 111 (2026) as an interim measure prior to the adoption of a mandatory MASS Code. The mandatory MASS Code is expected to enter into force 1 January 2032.
- While the scope of application is yet to be formally agreed, it is expected to initially be limited in application to cargo vessels only and exclude application to passenger ships. Discussion on the complexities of extending the application to passenger ships will take place at a later stage.
- It is intended that the mandatory Code will be a new instrument, however, SOLAS and associated instruments will need to be amended to ensure coherent implementation.
- Discussions through Inter-sessional Working Groups and Correspondence Groups are currently on-going at the IMO, dividing the draft Codes into focused reviews based on sections (through splinter groups) to maximise output. New definitions and terminology are under development by various industry stakeholders. The original 'degrees of autonomy' quoted above were only for the regulatory scoping exercise's purposes and are expected to be reframed away from 'ship-wide' definitions of autonomy and refer to more specific ship systems or functions/capabilities.

Implication: **Shipping regulators**: will have to determine the applicability of the requirements of the newly developed non-mandatory and subsequent mandatory MASS code to MASS assets under development, and also interpret the goal-based measures for proving system integrity, verifications & validation, and certification.

Shipyards, Ship operators, port/vessel traffic controls service providers, equipment manufacturers, seafarer training centres, national maritime authorities and certification bodies: will get a view of MASS requirements as the industry heads towards this new aspect of shipping's future.

Application: Maritime Autonomous Surface Ships (currently under discussion at the IMO). The Code is expected to be applicable to cargo ships to which SOLAS chapter I applies which have functions that enable autonomous or remote operations including any associated ROC(s) when the Administration deems that compliance with base instruments is not practicable.

This Code will not apply to:

- cargo high speed craft to which SOLAS chapter X applies; and
- warships, naval auxiliaries, and other ships owned or operated by a Contracting Government and used only on Government non-commercial service.

Related Instruments

- **MSC.1/Circ.1638 Outcome of the Regulatory Scoping Exercise for the use of Maritime Autonomous Surface Ships (MASS),**
- **LEG.1/Circ.11 Outcome of the Regulatory Scoping Exercise and Gap Analysis of Conventions emanating from the Legal Committee with respect to MASS,**
- **FAL.5/Circ.49 Outcome of the regulatory scoping exercise and gap analysis of the FAL Convention with respect to MASS.**

	How LR Can Support Clients LR can support your transition to autonomy shipping: **Autonomy ship operations | LR**.
586 Predicted entry into force **1 January 2032**	**Revision of SOLAS chapter III and the LSA Code** **Background:** The IMO has developed a draft roadmap for revising SOLAS Chapter III and the LSA Code, aimed at eliminating gaps, inconsistencies, and ambiguities, and restructuring the requirements into a goal-based format. The different phases considered in this work are listed below: • Alarm • Proceed to embarkation • Embarkation • Abandonment to safe position • Waiting for rescue • Person in water • Person over board • Retrieval to survival craft • Retrieval from survival craft • Transfer (of a person) Currently, the IMO is in the process of drafting functional requirements and expected performance criteria for SOLAS Chapter III and the LSA Code, based on identified goals and high-level hazards, such as transferring a rescued person (ship-to-ship or ship-to-helicopter). It progressed its work on the “Alarm" and "Proceed to Embarkation" phases and remaining work is going to continue. **Implication:** **Ship owners, shipyards, designers, and equipment manufacturers** should stay informed about the outcomes from the IMO, which may lead to the updated SOLAS Chapter III and the LSA Code and some consequential amendments. **Application:** The revised SOLAS Chapter III and the LSA Code, once approved and adopted, is expected to apply to ships in the same manner as before. Specifically, this includes cargo ships of 500GT or more and all passenger ships. The expected entry into force is not before 1 January 2032.
589 Predicted entry into force **1 January 2032**	**Draft amendments to MSC.402(96) - Requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear** **Background:** Resolution MSC.402(96) was adopted in 2016 with the aim of establishing a consistent, safe, and well-documented standard for

	maintaining, thoroughly examining, operationally testing, overhauling, and repairing lifeboats and rescue boats, as well as their launching appliances and release gear. Nevertheless, challenges have been experienced in implementing the resolution, primarily due to varying interpretations of terminologies. The IMO has now identified and categorised the issues as follows: • Authorisation of service providers, including equipment manufacturers • Manufacturer's established certification programme • Clarification of the certification of personnel • Definitions of various terms • Other Issues such as ambiguity in the authorised service providers' (ASPs) access to tools, documents, training, etc. The aforementioned issues will be considered when developing draft amendments to resolution MSC.402(96) which is yet to be drafted. The IMO also agreed in principle to the following draft definitions of "make", "type", "model" and "series": **Make** – original manufacturer of the type, model and series of equipment, as referred to on the approval certificate and/or ID plate, as appropriate. **Type** - category of equipment having common functional or design characteristics (non-exhaustive examples are listed in the annex). **Model** – a specific version of a particular make and type, as referred to on the approval certificate and/or ID plate, as appropriate. **Series** – a specific range of models from the same manufacturer that have equivalent design characteristics and maintenance requirements. **Implication:** **Shipowners, operators and equipment manufacturers** are advised to monitor forthcoming amendments to MSC.402(96) and remain informed about the most recent requirements. **Application:** The amended version of MSC.402(96) is expected to be applicable to all passenger ships, and to all cargo ships of 500GT and above, engaged in international voyages. The expected entry into force is 1 January 2032.
590 Predicted entry into force **1 January 2032**	**Draft amendments to SOLAS chapter II-2 and the FSS Code - detection and control of fires in cargo holds and on the cargo deck of containerships** **Background:** The IMO is developing amendments to SOLAS chapter II-2 and the FSS Code to enhance provisions for early fire detection and effective control of fires in containerised cargoes stowed on and under deck of containerships. **Detection and control of fires in cargo holds and on the cargo deck of containerships** The risk control options (RCOs) identified in table 91 of the CARGOSAFE FSA study have been considered together with relevant documents, with the following viable RCOs being focussed on for detection and control of fires in cargo holds and on the cargo deck of containerships: • Fixed fire detection within the cargo hold; • Fixed fire detection for containers carried on deck; • Portable IR cameras (thermal imagers); • Measures for fire-fighting including: - Water mist lances and the option of using devices with extended reach;

	- Review of present regulations applicable to mobile water monitors and option of introducing mobile water monitors with remote control; and - Systems using fixed water monitors with remote control; • Fixed CO_2 fire extinguishing systems; and • Protection of hatch covers. So far the following have been considered: • draft new SOLAS regulation II-2/7.11 on portable infrared thermal imagers; • draft amendments to SOLAS regulation II-2/10.7.3 concerning water mist lances and fixed and mobile water monitors; • draft guidelines for the design, performance, testing and approval of water mist lances; and • revision of MSC.1/Circ.1472 on mobile water monitor systems. Future work will include consideration of the following: • active protection systems (e.g. spraying water horizontally below the hatch coaming and deluge systems integrated into the pontoon hatches, as well as passive protection systems); • application and approval standards of video fire detection systems; • improved training of shoreside personnel throughout the supply chain; • measures to ensure the quality and reliability of shipper's declarations; • container scanning process in port; and • training of seafarers. **Implication:** **Designers, shipyards and shipowners** will need to comply with the amended SOLAS chapter II-2 and FSS Code requirements when they are finalised. **Application:** Expected to apply to container ships of 500GT or over constructed on or after 1 January 2032.
608 Predicted entry into force **1 January 2032**	**Draft amendments to SOLAS chapter III and chapter IV of the LSA Code to require the carriage of self-righting or canopied reversible liferafts for new ships** **Background:** The IMO agreed to equip all passenger and cargo ships with automatically self-righting or canopied reversible liferafts (except for liferafts with a capacity of 12 or fewer persons) and, consequentially, to amend regulations 21, 26 and 31 of SOLAS chapter III and paragraphs 4.2 and 4.3 of chapter IV of the LSA Code. **Implication:** **Equipment manufacturers**: will need to be aware that the construction and testing standards for liferafts will be updated so their products will need to meet the new requirements. **Shipowners and Operators**: will need to be aware that the equipment carriage requirements on their ships may change with this amendment.

	Application: The new requirements are expected to apply to automatically self-righting or canopied reversible liferafts (except for liferafts with a capacity of 12 or fewer persons, whether they are davit-launched or not) on new cargo and passenger ships. There is a general agreement for transitional arrangements of 3 and 5 years for the implementation for passenger ships and cargo ships respectively. The draft amendments are still being discussed and worked out and are expected to enter into force no earlier than 1 January 2032.
721 Predicted entry into force **1 January 2032**	**Draft amendments to SOLAS chapters II-1 (part C) and V - traditional and non-traditional propulsion and steering systems' requirements** **Background:** Steering systems have evolved radically since current SOLAS regulations were adopted. Many modern systems now are a combination of propulsion and steering, e.g., azimuth thrusters, podded propulsion, waterjet propulsion, Voith Schneider propellers etc. However, current SOLAS requirements do not adequately consider these non-traditional propulsion/steering systems. Until now, this issue was addressed by means of unified interpretations (MSC.1/Circ.1416/Rev.1), however a review of the current requirements was considered necessary in order to reflect modern propulsion and steering systems in the IMO's regulatory framework. The IMO is in the process of reviewing and drafting amendments, which are expected to enter into force by 2032, taking into account a revised high-level roadmap The IMO has agreed to the following draft amendments in principle, also inviting further comments and proposals from the member States and other interested organisations before finalisation: • A new SOLAS regulation II-1/28-1 – Means of going astern and stopping. With a goal to prevent casualties arising from malfunctions or insufficient performance, the proposed amendments address the ship's astern propulsion and stopping ability. Future developments, if agreed, could introduce mandatory performance criteria for providing adequate propulsion performance and adequate ability to stop. • A new SOLAS regulation II-1/29-1 – Steering. With the goal to prevent casualties arising from malfunction, insufficient performance or incorrect use of steering system(s), the current draft provides requirements for expected ship steering performance, which additional information the officer in charge of navigational watch should have access to, and the design principles to be applied (steering gear performance, failure tolerance of steering system, steering control systems, power supply etc.). Progress has been made on the following draft amendments to the following sections of SOLAS: • SOLAS regulation II-1/3- Definitions relating to Parts C, D and E - Updates to definitions including "Steering system" and "Steering gear" are proposed • SOLAS regulation II-1/28 Means of going astern, II-1/29 Steering gear and II-1/30 Additional requirements for electric and electrohydraulic steering gear - Introduction of specific applications of the regulation as the current regulation will need to state that it applies to “traditional steering systems” • SOLAS regulation II-1/42 and II-1/ 43 - Emergency source of electrical power in passenger ships and cargo ships - Minor amendments to references

	• SOLAS regulation V/25 – Operation of steering gear
	  - It is proposed that ships fitted with multiple steering systems will need to have more than one steering system in operation when navigating in areas where navigation demands special caution.
	• SOLAS regulation V/26 – Steering gear: Testing and drills
	  - Amendments to refer to steering gear rather than “rudders”, and the introduction of a requirement for ships' officers concerned with the operation and/or maintenance of steering gear to be familiar with the ship's manoeuvring characteristics
	
	A number of related instruments could be required to be amended as a consequence of the changes envisaged:
	• MSC.1/Circ.1536 – Unified Interpretation of SOLAS regulations II-1/29.3 and 29.4 into the development of the new regulations.
	• Resolution A.467(XII) – *Guidelines for acceptance of non-duplicated rudder actuators for tankers, chemical tankers and gas carriers of 10,000 tons gross tonnage and above but less than 100,000 tonnes deadweight.*
	• Resolution MSC.137(76) – *Standards for Ship Manoeuvrability.*
	• MSC/Circ.1053 – *Explanatory Notes to the Standards for ship manoeuvrability.*
	• Resolution A.601(15) – *Provision and Display of Manoeuvring Information on board Ships.*
	• MSC.64(67) - *Recommendation on performance standards for heading control systems*.
	• Amendments to MSC.1/Circ.1212/Rev.2 - *Revised Guidelines on Alternative Design and Arrangements for SOLAS Chapters II-1 and III.*
	
	Implication: These amendments are expected to provide designers with a framework and supporting guidance to safely include alternative propulsion and steering systems on ships.
	
	Application: It is expected that the draft amendments will apply to all new passenger ships and to all cargo ships of 500GT and above engaged in international voyages:
	• for which the building contract is placed on or after 1 January 2032; or
	• in the absence of a building contract, the keel of which is laid or which are at a similar stage of construction on or after 1 July 2032; or
	• the delivery of which is on or after 1 January 2036.

850 Predicted entry into force **1 January 2032**	**Draft amendments to the International Life-Saving Appliance (LSA) Code - Ventilation of partially enclosed lifeboats** **Background:** The IMO previously adopted new amendments to the International Life-Saving Appliance Code in relation to the ventilation requirement for fully enclosed lifeboats. There was a discussion to extend these requirement to partially enclosed lifeboats, however a compelling need could not be established. Having considered new evidence supporting the need for ventilation requirements for partially enclosed lifeboats, the IMO has agreed to develop draft amendments to the LSA Code, chapter IV - Survival Craft, adding a new paragraph 4.5.5.

	Implication: Partially enclosed lifeboats are expected to have a means to admit sufficient air to prevent a long-term CO_2 concentration of more than 5,000 ppm for the number of persons the lifeboat is permitted to accommodate, even with the entrances closed. There are several options for achieving the aforementioned requirement: • the arrangement should provide a ventilation rate of at least 5 m^3/h per person for the number of persons which the lifeboat is permitted to accommodate and for a period of not less than 24 hours. The ventilation means shall be operable from inside the lifeboat and shall be arranged to ensure that the lifeboat is ventilated without stratification or formation of unventilated pockets. Where the means of ventilation is powered, the source shall not be the radio batteries referred to in paragraph 4.4.6.11; and where dependent on the lifeboat engine, sufficient fuel shall be provided to comply with paragraph 4.4.6.8; or • providing ventilation openings with the total cross section of at least 4% of the floor area of the lifeboat with openings set in the opposite direction , as far apart from each other and as high as possible; or • any other appropriate solutions that prevent a long-term CO_2 concentration of more than 5,000 ppm. **Application:** This is expected to apply to all partially enclosed lifeboats installed on new and existing ships and is expected to enter into force no earlier than 1 January 2032.
859 Predicted entry into force **1 January 2032**	**Review and update of SOLAS regulation II-2/9 on containment of fire to incorporate existing guidance and clarify requirements** **Background:** The IMO agreed to review and update SOLAS regulation II-2/9 on *containment of fire* to incorporate existing guidance and clarify requirements in SOLAS regulations II-2/9.7.3.1.3 (fire insulation of duct sleeves) and 9.2.3.3 (fire integrity of bulkheads and decks), and tables 9.5 (fire integrity of bulkheads separating adjacent spaces) and 9.6 (fire integrity of decks separating adjacent spaces), to remove any ambiguities. The IMO may also produce a new guidance document, (i.e. an MSC Circular) to incorporate existing explanatory figures associated with guidance text that has been proposed to include in the update to SOLAS regulation II-2/9. **Implication:** This work should have a minimal impact on clients as it is intended to only incorporate existing guidance and clarify requirements in SOLAS regulation II-2/9. **Application:** The amendments will apply to all ships subject to SOLAS regulation II-2/9, and are expected to enter into force on 1 January 2032.
823 Predicted entry into force to be decided	**Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels** **Background:** The IMO has concluded what is effectively a scoping exercise of fuels and technologies being considered by the industry and the risks associated with the deployment of those fuels and technologies, the technology readiness, and the regulatory framework already in existence.

During MSC 110, tasks were developed for IMO Sub-Committees to take forward. Not all will become mandatory requirements, but at this early stage all are included in the list until such time as its clear what the expected work plan is. These included the following:

Tasks for CCC:

- Develop Guidance on safe storage and handling of FAME as a fuel;
- Consider low-flashpoint HVO to be incorporated in the work done for low-flashpoint oil fuels;
- Investigate and develop amendments to the IBC Code and the Interim guidelines for Methyl/Ethyl Alcohol as Fuel;
- Develop interim guidelines for safe design of ships using Dimethyl Ether (DME) as fuel;
- Finalise interim guidelines for ships using hydrogen as fuel;
- Consider developing mandatory requirements for LPG as fuel;
- Consider the need for an interpretation or amendment to SOLAS Chapter VI, Reg 5-2 Prohibition of blending of bulk liquid cargoes and production processes during sea voyages" to clarify that it does not apply to the blending or otherwise processing fuel for use onboard;
- Develop guidance to address the safety risks of fuel mixtures based on their composition;
- Further consider the revision of the Interim guidelines for the safety of ships using fuel cell power installations;
- Develop requirements for hydrogen generation onboard ships;
- Identify existing standards for high-pressure composite cylinders;
- Develop safety requirements for high-pressure composite cylinders to be used as fuel containment systems;
- Consider whether amendments are needed to the IMDG Code to ensure the safe transport of portable fuel tanks and MEGCs that are to be used as fuel tanks on ships;
- Develop safety requirements for metal hydride fuel storage systems;
- Develop safety requirements for liquid organic hydrogen carrier (LOHC) fuel storage systems;
- Consider whether amendments are needed to the IMDG Code for the storage and transport of CO_2 resulting from onboard carbon capture and storage systems on ships; and
- Develop safety requirements for onboard carbon capture and storage systems on ships.

Tasks for SSE:

- Within the FSS Code, develop or identify appropriate standards for system certification of water based and gas based firefighting systems to extinguish alcohol fires;
- Develop amendments to SOLAS II-2 Part B, and the Guidelines for Measures to Prevent Fires in Engine-Rooms and Cargo Pump-Rooms (MSC.1/Circ.1321), as appropriate to include safety requirements addressing the risk posed by Fischer-Tropsch (FT) diesel fuel having an auto-ignition temperature (208-deg C);
- Develop requirements for the Safety of Ships Using Lithium-ion Battery Installations;
- Develop requirements for supercapacitor energy storage systems; and
- Developing provisions related to swappable traction battery containers to be included in the new interim guidelines for Battery Energy Storage Systems.

Tasks for SDC:

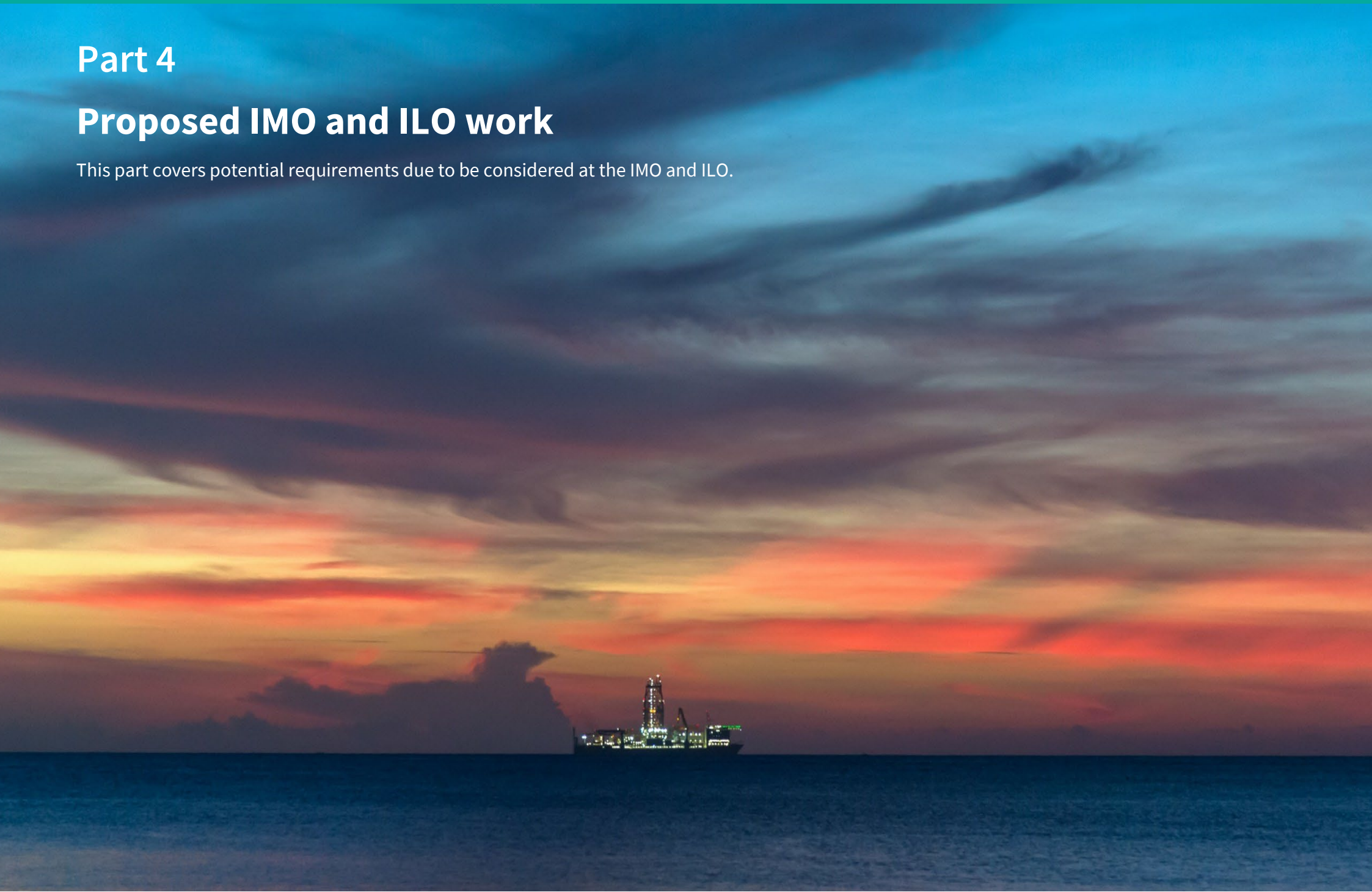
- Update the Code of Safety for Nuclear Merchant Ships (Resolution A.491(XII));

	• Develop Interim guidelines for the Safety of Ships Using Wind Propulsion and Wind Assisted Power; • Develop amendments to SOLAS II-1/Reg 41 that allow for batteries to be used as the main source of electrical power and lighting systems; • Amend TM.5/Circ.6 to clarify whether battery containers should be included in the ship's enclosed space; and • Draft a unified interpretation or guidelines, to develop installation requirements for safety approval plate in battery containers. The Sub-Committees will develop a holistic work plan to assess the gaps and barriers to deployment of fuels and technologies, and to identify the instrument that may need to be amended prior to development of those amendments. A work plan will be developed by each Sub-Committee to be reported to MSC 111 in November 2026. **Implication:** **Shipowners and operators** considering new fuels and technologies should follow the work to understand the regulatory framework that will be developed specific to the fuel and/ or technologies being considered. **Application:** The application will be decided based upon the fuel or technology being considered.

Part 4

Proposed IMO and ILO work

This part covers potential requirements due to be considered at the IMO and ILO.



737

Proposed measures for the carriage of plastic pellets

Background: In response to the *MV X-Press Pearl* incident in 2021 (which resulted in the spillage of 11,000 tonnes of plastic pellets off the shore of Sri Lanka) the IMO is considering options for reducing the environmental risk associated with the maritime transport of plastic pellets. In particular work is being undertaken to consider how mandatory instruments could be developed to regulate the carriage of plastic pellets. Such mandatory instruments could include amendments to MARPOL Annex III or assignment of individual UN numbers (class 9) for plastic pellets.

Implication: **Shipowners and Ship Managers** will need to be aware of any new mandatory classification of plastic pellets and the associated carriage requirements.

Application: All ships carrying plastic pellets.

Further Information
IMO is expected to publish *Best practice guidelines* to clean up spills of plastic pellets on Publications.

Related Instruments
- **MEPC.1/Circ.909 - Recommendations for the carriage of plastic pellets by sea in freight containers**

831

Proposed Application of the IGF Code to Gas Carriers

Background: MSC 95 made a policy decision that either the IGF or IGC Code would be applicable to a ship and that in the case of a gas carrier using a non-cargo as fuel it should use the safety requirements in the IGC Code for the arrangements on board. This is mirrored in the application of the IGF Code in SOLAS II-1.

Due to the growing interest in using gas and low-flashpoint fuels to lower ship carbon emissions, there has been an ongoing discussion with regard to gas carriers wishing to use a low-flashpoint fuel which is not a gas fuel as well as using gas fuels not considered in the IGC Code and which requirements should be used.

During MSC 110 three scenarios were highlighted that need to be addressed by the regulatory framework:
1. Ships in scope of the IGC Code using a product listed in chapter 19 of the IGC Code (listing gas products in scope of the IGC Code) carried as cargo, as fuel.
2. Ships in scope of the IGC Code using a product listed in chapter 19 of the IGC Code not carried as cargo, as fuel.
3. Ships in scope of the IGC Code using a product that is not listed in chapter 19 of the IGC Code, as fuel.

Going forward, it was agreed that:
1. Gas carriers using products listed in chapter 19 of the IGC Code, as fuel, would be subject to the IGC Code requirements.

	2. Gas carriers using gaseous or low-flashpoint fuels other than products listed in chapter 19 of the IGC Code, as fuel, would be subject simultaneously to requirements broadly based on the relevant parts of the IGF Code and the IGC Code. 3. The coexistence of application of both Codes will be addressed by means of guidelines to be developed by the IMO. 4. CCC will develop two sets of guidelines: one concerning products listed in chapter 19 of the IGC Code, used as fuel; and another concerning gaseous or low-flashpoint fuels other than products listed in chapter 19 of the IGC Code, used as fuel. **Implication:** Gas carriers which use low-flashpoint fuels or gas fuels which are not listed in chapter 19 of the IGC Code will be required to comply with new guidelines to be developed for the arrangements related to fuel consumption. Owners and operators of such ships should be aware of the guidelines as they are developed. Gas carriers using cargoes listed in chapter 19 as fuel, may do so subject to chapter 16. Where the fuel used is not carried as cargo, the ship is to comply with the most stringent requirements for the cargo or fuel, as appropriate. Guidelines to support this will be developed. **Application:** Gas carriers using low-flashpoint or gas fuels not listed in chapter 19 of the IGC Code will need to comply with guidelines to be developed. It is currently expected that these will be published by 2030.
610	**Proposed revision of the 2010 FTP Code to allow for new fire protection systems and materials** **Background:** MSC 103 approved a new output to review and amend the 2010 FTP Code. The scope includes allowing for new fire protection systems and materials, updating the FTP Code to include existing unified interpretations and updating references to the most recent ISO fire test standards. The IMO has considered documents identifying ambiguities within the FTP Code and proposing new materials and new construction techniques to be addressed in development of the revision to the FTP Code. The following proposals have been considered: • incorporating a reference to resolution A.753(18) on *Guidelines for the use of plastic pipes on ships*, as amended, into the 2010 FTP Code as a footnote; • various draft text adjustments and corrections to the 2010 FTP Code with the aim of improving uniformity, to ensure a consistent and fair interpretation and a level playing field among manufacturers, test laboratories and Administrations; • edits to the 2010 FTP Code, providing clarification to a number of sections, proposing changes to existing text, and identifying areas for discussion and development; and • amendments to Part 3, Annex 1 of the 2010 FTP Code by adding fire test requirements for "H" class divisions, (typically used in offshore units and are designed to withstand hydrocarbon fires, with more stringent requirements than "A" class divisions) so as to provide guidance on the implementation of tests according to unified standards and ensure the accuracy and reliability of the tests. Work on the above proposals will continue intersessionally in a correspondence group reporting to SSE 12 (March 2026). **Implication:** **Designers, shipbuilders, manufacturers and testing laboratories** will need to take account of the revised FTP Code allowing for new fire protection systems and materials. **Application:** If approved and adopted by 30 June 2030, the draft amendments will enter into force from 1 January 2032.

	The FTP Code is applicable for products which are required to be tested, evaluated and approved in accordance with the Fire Test Procedures Code as referenced in SOLAS, which is applicable to cargo ships of 500GT and above and passenger ships.
767	**Proposed evaluation of adequacy of fire protection, detection and extinction arrangements in vehicle, special category and ro-ro spaces in order to reduce the fire risk of ships carrying new energy vehicles** **Background:** The IMO agreed on a road map and goal-based approach for effective consideration of fire protection, detection and extinction arrangements in vehicle, special category and ro-ro spaces in order to reduce the fire risk of ships carrying new energy vehicles, including battery electric vehicles (BEVs). SSE developed a draft action plan, based on the previously agreed road map, and agreed that further work should be carried out including: • further developing the draft action plan;expanding the list of relevant scientific reports and studies, etc. related to fire safety systems for ships carrying new energy vehicles, including Battery Electric Vehicles (BEVs); • consideration of detection systems within vehicle spaces and ro-ro spaces on cargo ships, e.g. heat and smoke detectors within an addressable system; • consideration of preliminary draft amendments to SOLAS II-2/20 relating to fire confirmation (video monitoring systems) within vehicle spaces and ro-ro spaces on cargo ships; • consideration of fire safety using advanced methods and technologies which may enhance the scientific validity and reliability of risk assessment related to BEVs; • developing definitions for the terminology used in the context of lithium-ion battery fires; and • identifying hazards related to new energy vehicles, including BEVs, and risk control options. **Implication:** **Designers, shipyards and shipowners** will need to comply with the amended SOLAS chapter II-2 and FSS Code requirements when they are finalised. **Application:** The new requirements will most likely be included in SOLAS chapter II-2/20 and the FSS Code. The next potential entry into force date is 2032.

Part 5 - Changes since previous version

This part covers changes from the Spring 2025 version to the Autumn 2025 version
(Note: Shows just the changes of items moving between sections, content for each individual item could still change even if an item has not moved)

Autumn 2025

Part 1 – Adopted requirements in a transitional period for full application
Deletions
- 342 (Deleted from document) – Amendments to MARPOL Annexes I, II, V and VI and the NOx Technical Code 2008 - Use of electronic record books
- 518 (Deleted from document) – Amendments to MARPOL Annex VI establishing the Mediterranean Sea Emission Control Area for sulphur oxides and particulate matter

Moved
155 (Moved from Part 2) - Hong Kong International Convention on the Safe and Environmentally Sound Recycling of Ships, 2009

Part 2 – Adopted requirements entering into force in future
Deletions
- 466 (Deleted from document) – Amendments to regulation 13.2.2 of MARPOL Annex VI on a marine diesel engine replacing a steam system
- 611 (Deleted from document) – Amendments to MARPOL Annex VI regulation 27 and Appendix IX on IMO DCS
- 656 (Deleted from document) – Amendments to MARPOL Annex VI, regulations 2, 14, and 18 and Appendix I (Low-flashpoint fuels and other fuel oil related issues)
- 612 (Deleted from document) – Amendments to regulations A-1 and B-2 of the BWM Convention on the use of electronic record books

Moved
155 (Moved to Part 1) - Hong Kong International Convention on the Safe and Environmentally Sound Recycling of Ships, 2009
709 (Moved from Part 3) - Amendments to the IMSBC Code (Amendment 08-25)
609 (Moved from Part 3) - Amendments to paragraph 8.3.5 and annex 1 of the 1994 and 2000 HSC Codes with regard to lifejacket carriage requirements of SOLAS chapter III
642 (Moved from Part 3) - Amendments to SOLAS regulation V/23, MSC resolution on performance standards and consequential amendments to the 1994 and 2000 HSC Codes and the 2008 SPS Code, to improve the safety of pilot transfer arrangements
- **ILO16** (Moved from Part 2) - Amendment to MLC, 2006 Standard A2.5.1 on repatriation
- **ILO17** (Moved from Part 2) - Amendments to MLC, 2006 Standard A2.4 on shore leave
- **ILO20** (Moved from Part 2) - Amendment to the MLC, 2006 on the investigation of marine casualties
- **ILO21** (Moved from Part 2) - Amendment to the MLC, 2006 on onboard complaints procedures
- **ILO23** (Moved from Part 2) - Amendments to the MLC, 2006 on the prevention of shipboard violence and harassment, including sexual harassment, bullying, and sexual assault

Part 3 – IMO and ILO requirements still under development
Deletions
- 808 (Deleted from document) – Draft amendments to Transport Provisions for Vehicles within the IMDG Code (Special Provision 961, Special Provision 962)

Part 3

Additions

+ 906 (New) - Draft amendment to SOLAS regulation IV/5 (Provision of Radiocommunication Services), SOLAS regulation V/4 (Navigation Warnings) and SOLAS regulations V/5 (meteorological services and warnings)

+ 934 (New) - Draft amendments to the IMSBC Code (09-27)

+ 917 (New) - Draft amendments to IGF Code (related to draft amendments to SOLAS regulation II-1/2)

Moved

709 (Moved to Part 2) – Draft amendments to the IMSBC Code (Draft Amendment 08-25)

609 (Moved to Part 2) - Draft amendments to paragraph 8.3.5 and annex 1 of the 1994 and 2000 HSC Codes

642 (Moved to Part 2) - Draft amendments to SOLAS regulation V/23, Draft MSC resolution on Performance standards and Consequential draft amendments to the 1994 and 2000 HSC Codes and the 2008 SPS Code, to improve the safety of pilot transfer arrangements

- **ILO16** (Moved to Part 2) - Draft amendment to MLC, 2006 Standard A2.5.1 on repatriation
- **ILO17** (Moved to Part 2) - Draft amendments to MLC, 2006 Standard A2.4 on shore leave
- **ILO20** (Moved to Part 2) - Draft amendment to the MLC, 2006 on the investigation of marine casualties
- **ILO21** (Moved to Part 2) - Draft amendment to the MLC, 2006 on onboard complaints procedures
- **ILO23** (Moved to Part 2) - Draft amendments to the MLC, 2006 on the prevention of shipboard violence and harassment, including sexual harassment, bullying, and sexual assault

Part 4 – Prospective IMO and ILO requirements

Deletions

- 809 (Deleted from document) – Proposed amendments to the IMDG Code to mitigate the risks and consequences of cargo fires on containerships

- 827 (Deleted from document) – Proposed amendments to MARPOL Annex V and associated guidelines for a goal-based fishing-gear marking requirement

No Additions or Moves

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