



MSC 104 BRIEF

The IMO Maritime Safety Committee (MSC) held its 104th session from October 4 to 8, 2021. This Brief provides an overview of the more significant issues progressed at this session.

KEY DEVELOPMENTS

- WT Door Regulation Amendments Across IMO Instruments
- Model Regulations on Domestic Ferry Safety
- Path Forward for MASS
- Remote Surveys
- COVID-19 Challenges to Seafarer Certification

ABS RESOURCES

- ABS Global Marine Services ([link](#))
- Advisory on Autonomous Functionality ([link](#))
- IMO Polar Code Support Services ([link](#))
- ABS Regulatory News ([link](#))
- ABS Rules and Guides ([link](#))

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AMENDMENTS TO MANDATORY INSTRUMENTS

Amendments to Load Lines Convention

The Committee adopted a resolution containing amendments to Annex B of the 1988 Load Lines Protocol relating to watertight doors on cargo ships. The amendments are intended to address inconsistencies in several IMO instruments with respect to doors in watertight bulkheads. The Convention requires that the final waterline after flooding shall not be above the lower edge of any opening through which progressive downflooding may take place, however in accordance with the amended text, this waterline is now permitted to submerge the lower edge of :

- 1) remotely operated sliding watertight doors,
- 2) hinged watertight access doors of the quick-acting or single-action type with open/closed indication locally and at the navigation bridge, and
- 3) hinged watertight doors that are permanently closed at sea.

These amendments apply to new and existing ships as of 1 January 2024.

Amendments to IGC Code

Similar to the above noted amendments to the Load Lines Convention, the Committee adopted a resolution containing amendments to Chapter 2 of the IGC Code relating to watertight doors on cargo ships. The amendments are intended to address inconsistencies in several IMO instruments with respect to doors in watertight bulkheads. The Convention requires that the final waterline after flooding shall not be above the lower edge of any opening through which progressive downflooding may take place, however in accordance with the amended text, this waterline may exceed the lower edge of :

- 1) remotely operated sliding watertight doors,
- 2) hinged watertight access doors of the quick-acting or single-action type with open/closed indication locally and at the navigation bridge, and
- 3) hinged watertight doors that are permanently closed at sea.

These amendments apply to new and existing ships as of 1 January 2024.

MEASURES TO IMPROVE DOMESTIC FERRY SAFETY

Model Regulations on Domestic Ferry Safety

The Committee approved the finalized text of the draft “Model Regulations on Domestic Ferry Safety”. The Model Regulations have been informed by several expert group meetings and have been developed in support of Member States concerned



with improving the safety of ferry services within their area of authority. The Model Regulations provide a framework of provisions on domestic ferry safety for incorporation into national law or to serve as a basis for intergovernmental agreements. The IMO Secretariat will prepare a draft MSC resolution for formal adoption at MSC 105.

The IMO Secretariat will also commence development of explanatory notes to support the Model Regulations for consideration at MSC 107. Future work is also intended to develop associated online training material to facilitate the implementation of these measures to improve domestic ferry safety.

MARINE AUTONOMOUS SURFACE SHIPS (MASS)

Path Forward for MASS in the IMO Regulatory Framework

With the Regulatory Scoping Exercise (RSE) for MASS operations completed at MSC 103, the Committee invited Member States to submit proposals on the best way forward to address MASS in the IMO regulatory framework. Among the proposals put forward was the development of a goal-based MASS instrument (e.g. a MASS Code) and non-mandatory instruments (e.g. guidelines for MASS operations).

Due to time constraints, the individual proposals were not able to be discussed in detail. However, MSC 105 has been tasked with finalizing the roadmap to address MASS operations in IMO instruments with a target completion year of 2022 with the goal of producing a standard for implementation by 2025. The working group on MASS will be re-established at MSC 105 which is scheduled to convene in April 2022. Intersessionally, the Chair of the Committee will prepare a draft of the roadmap to address MASS operations in the IMO regulatory framework.

REMOTE SURVEYS AND AUDITS

Remote Surveys, ISM Code audit and ISPS Code verifications

The Committee received proposals to develop guidance on remote surveys/audits/verifications (a methodology without surveyor/auditor physical attendance on board) in response to an increase in their use during the COVID-19 pandemic. Several Member States submitted proposals for development of guidance for such a methodology and it was noted that any developed framework for should avoid additional burdens on shipowners, managers and crew as much as practicable. The Committee agreed to task the III Sub-Committee with the development of guidance on assessment and application of remote surveys, with a target completion year of 2024.

IMPLEMENTATION OF IMO INSTRUMENTS

Updates to Survey and PSC Guidance

The Committee approved, subject to MEPC 77's concurrent decision, scheduled for November 2021, the following draft Assembly resolutions, produced by the III Sub-Committee:

- 1) *Procedures for Port State Control, 2021* (will revoke resolution A.1138(31));
- 2) *Survey Guidelines Under the Harmonized System of Survey and Certification (HSSC), 2021* (will revoke resolution A.1140(31));
- 3) *2021 Non-Exhaustive List of Obligations Under Instruments Relevant to the IMO Instruments Implementation Code (III Code)* (will revoke resolution A.1141(31)).

These will be presented for adoption at the 32nd session of the IMO Assembly in December 2021.



NAVIGATION, COMMUNICATIONS AND SEARCH AND RESCUE

Recognition of the Japanese Regional Navigation Satellite System Quasi-Zenith Satellite System (QZSS)

After consideration by the NCSR Sub-Committee, the Committee adopted a circular granting recognition of the Japan Quasi-Zenith Satellite System (QZSS) as a component of the Worldwide Radionavigation system.

Modernization of the Global Marine Distress and Safety System (GMDSS)

The Committee approved draft amendments to SOLAS Chapter II-1, Chapter III, Chapter IV and Chapter V updating the functional requirements of GMDSS equipment, updating several requirements for transmission and reception of distress alerts and communications.

Based on the approved draft amendments to SOLAS, several consequential amendments to the following IMO instruments were also approved:

- 1) 1994 and 2000 HSC Code;
- 2) 1983 SPS Code and 2008 SPS Code;
- 3) 1979, 1989 and 2009 MODU Code.

A large number of draft resolutions and circulars were also approved in relation to updating of standards for radiocommunication equipment:

- 1) Draft resolution, *System performance standard for the promulgation and coordination of maritime safety information using high-frequency narrow-band direct-printing*, revising and superseding resolution A.699(17);
- 2) Draft resolution, *Performance standards for the reception of maritime safety information and search and rescue related information by MF (NAVTEX) and HF*, revising and consolidating resolutions A.700(17) and MSC.148(77), as amended;
- 3) Draft resolution, *Provision of radio services for the Global Maritime Distress and Safety System (GMDSS)*, revising and superseding resolution A.801(19), as amended;
- 4) Draft resolution, *Performance standards for search and rescue radar transponders*, revising and superseding resolutions A.530(13) and A.802(19), as amended;
- 5) Draft resolution, *Performance standards for shipborne VHF radio installations capable of voice communication and digital selective calling*, revising resolution A.803(19), as amended;
- 6) Draft resolution, *Performance standards for shipborne MF and MF/HF radio installations capable of voice communication, digital selective calling and reception of maritime safety information and search and rescue related information*, revising and consolidating resolutions A.804(19), as amended, and A.806(19), as amended;
- 7) Draft resolution, *Performance standards for Inmarsat-C ship earth stations capable of transmitting and receiving direct-printing communications*, revising resolution A.807(19), as amended;
- 8) Draft resolution, *Guidelines for the avoidance of false distress alerts*, revising and superseding resolution A.814(19);
- 9) Draft resolution, *Performance standards for survival craft portable two-way VHF radiotelephone apparatus*, revising resolution MSC.149(77);
- 10) Draft resolution, *Amendments to the performance standards for radiocommunication equipment (resolution MSC.80(70))*;
- 11) Draft resolution, *Performance standards for a shipborne integrated communication system (ICS) when used in the Global Maritime Distress and Safety System (GMDSS)*, revising resolution A.811(19); and



- 12) Draft circular, *Participation of non-SOLAS ships in the Global Maritime Distress and Safety System (GMDSS) and guidance on the development of training materials for GMDSS operators on non-SOLAS ships*, to be disseminated as MSC.1/Circ.803/Rev.1; and
- 13) Draft circular, *Guidance for the reception of maritime safety information and search and rescue related information as required in the Global Maritime Distress and Safety System (GMDSS)*.

MATTERS RELATED TO THE COVID-19 PANDEMIC

Comprehensive Action to Address Seafarers' Challenges During the COVID-19 Pandemic

The Committee approved a draft resolution for approval by the IMO Assembly in December 2021, consolidating previous recommendations to Member States and calling for the designation of seafarers as “Key Workers”, and for States to subsequently prioritize the vaccination of seafarers and to prioritize the medical care and travel authorizations of seafarers. This draft resolution is intended to acknowledge the ongoing challenges that the COVID-19 pandemic continues to present for international shipping, and to urge Member States to remain mindful of the welfare of seafarers and to support their well-being.

Seafarers' Training and Certification During the COVID-19 Pandemic

The Committee approved a circular, *Guidance on Seafarers' Training and Certification for Issuing Administrations, Flag States and Port States During the COVID-19 Pandemic*, in order to provide guidance on implementing provisions of the 1978 STCW Convention during the exceptional circumstances of the COVID-19 pandemic. This guidance acknowledges the challenges faced by Issuing Administrations in continuing to strictly adhere to the provisions of the STCW Code, and it supports the use of exceptional measures (such as seafarer certificate extensions and remote training methods) while also noting the importance that policies for such measures should be communicated openly through the IMO and reviewed regularly to confirm their effectiveness. The guidance also encourages Port States to adopt a pragmatic and practical approach when considering seafarer certifications.

POSTPONEMENT OF AGENDA ITEMS

Decisions of the Committee

Due to closure of the IMO Building and limitations of the virtual meeting format utilized at this session, the Committee agreed to postpone consideration of the following proposals. Related submissions will be referred to MSC 105.

1. Preventing loss of containers at sea;
2. Implementation of the IMO Polar Code;
3. Clarifications for the Requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear (resolution MSC.402(96)).



FUTURE DEVELOPMENTS

Proposed Amendments to LSA Code

The Committee approved draft amendments to the LSA Code containing new standards for power ventilation systems on totally enclosed lifeboats installed on/after the possible entry into force date. The ventilation system will be required to achieve a ventilation rate of 5m³ per hour per person, for the number of persons accommodated by the lifeboat, and must be capable of operating for a period of not less than 24 hours. The source of power shall not be the radio batteries, and additional fuel requirements will apply if the system is dependent on the lifeboat engine. Additional requirements on inlet and outlet openings will also be included.

The Committee determined that approval of the draft amendments to the LSA Code should be postponed until correlated amendments to the *Revised recommendation on testing of life-saving appliances* (resolution MSC.81(70)) could be approved as a package.

Next Steps: The SSE 8 Sub-Committee will finalize draft amendments to the testing standards of MSC.81(70). These amendments are scheduled to be approved by a subsequent session of the MSC, for possible entry into force on 1 January 2026.

Recommended Co-Operation to Ensure the Rescue of Persons at Sea

The Committee discussed a proposed resolution calling on Member States as well as owners and captains of ships to commit to effective cooperation in accordance with the intentions of the SOLAS and SAR Conventions. The resolution notes that a rescue operation is not complete until rescued persons are delivered to a place of safety, and acknowledges past instances where ships were not given fast access to disembark persons taken onboard in a distress situation. Member States are called upon to commit to co-operation in all phases to a Search and Rescue operation.

Next Steps: Because there was some disagreement on the role of the Coastal Authority and the Flag Administration of the rescuing vessel, further discussion on this item was delayed until MSC 105.

Safety of Pilot Transfer Arrangements

The Committee received a proposal for revision of SOLAS Chapter V / Regulation 23 (and associated instruments) to improve the safety of pilot transfer arrangements. This has been proposed in recognition of noted inconsistencies in the maintenance and inspection requirements for pilot ladders and reporting from the International Maritime Pilots' Association (IMPA) of a 14% rate of non-compliance of pilot transfer arrangements on all ship types.

Next Steps: The NSCR Sub-Committee will be tasked with developing revisions to SOLAS Chapter V / Regulation 23 and associated instruments to improve the safety of pilot transfer arrangements, with a target completion year of 2023.