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**COMPREHENSIVE REVISION OF THE GUIDELINES ON THE IMPLEMENTATION OF
THE ISM CODE BY ADMINISTRATIONS AND COMPANIES**

Proposals to improve the implementation of the ISM Code by Administrations

Submitted by ICS

SUMMARY

<i>Executive summary:</i>	This submission contains proposals to revise the <i>2023 Guidelines on implementation of the International Safety Management (ISM) Code by Administrations</i> (resolution A.1188(33)). The proposed changes aim to improve the overall implementation of the ISM Code.
<i>Strategic direction, if applicable:</i>	6 and 7
<i>Output:</i>	6.5
<i>Action to be taken:</i>	Paragraph 29
<i>Related documents:</i>	MSC 107/17/5; MSC 109/19/7, MSC 109/INF.3 and resolution A.1188(33)

BACKGROUND

1 MSC 107/17/5 (Norway) proposed a new output on the "Comprehensive review of the International Safety Management (ISM) Code and its related guidelines". Following consideration of the proposal, together with information provided orally by the Secretariat at MSC, the Committee agreed to keep the proposal in abeyance until after the results of the Secretariat's study on the ISM Code and related instruments were available.

2 The report of the Study on the effectiveness and effective implementation of the International Safety Management (ISM) Code (herein referred to as "the Study"), as set out in document MSC 109/INF.3 (Secretariat), was submitted to MSC 109. The Study focused on the assessment of the effectiveness and effective implementation of the ISM Code and its related instruments and associated provisions, with a view to obtaining objective evidence and drawing conclusions on the current relevance of, and difficulties, gaps, flaws or failures relating to, the implementation of the aforementioned instruments within their respective scopes of application, i.e. Governments, ships and ships' crews, and shipping companies.

3 The discussions held at MSC 110, after postponement at MSC 109 owing to time constraints, highlighted that implementation was a key challenge regarding the effectiveness of the ISM Code. The ISM Code itself had been widely regarded as a fit-for-purpose, goal-based framework that effectively supported robust safety management in shipping. Its flexible structure already enabled the addressing of industry changes, technological advancements, and other developments, and the avoidance of amendments to the Code should be maintained at this stage.

4 The Committee agreed to include in the biennial agenda of the III Sub-Committee for 2026-2027 and the provisional agenda for III 12 an output on "Comprehensive revision of the guidelines on the implementation of the ISM Code by Administrations and companies", with a target completion year of 2028.

5 The International Chamber of Shipping (ICS), representing national shipowners' associations and over 80% of the world's merchant fleet tonnage, has drafted these proposals with extensive input from our membership. The intention is to improve the effectiveness of the implementation of the ISM Code and improve safety at sea, prevention of human injury or loss of life, and protection of the marine environment.

Discussion

6 The *2023 Guidelines on implementation of the International Safety Management (ISM) Code by Administrations* (resolution A.1188(33)) were last revised in December 2023. These revised guidelines establish basic principles for:

- .1 verifying that the safety management system of a company responsible for the operation of ships, or the safety management system for the ship or ships controlled by the company, complies with the ISM Code;
- .2 carrying out the interim, initial, annual and renewal verification(s) of the Document of Compliance and the interim, initial, intermediate and renewal verification(s) of the Safety Management Certificate and the issuing/endorsement of the corresponding documents; and
- .3 the scope of the additional verification.

7 The Guidelines stress that the Administration is responsible for verifying compliance with the requirements of the ISM Code and for issuing Documents of Compliance to companies and Safety Management Certificates to ships.

8 Highlighted in the annex, ICS has suggested a number of revisions to the guidelines, and highlighted below, in paragraphs 9 to 28, is the rationale behind each suggested change.

Proposals

Definition of Company

9 Recommendation 3 of the Study suggests that the definition of "Company" should be updated to reflect modern company and management structures, including delegated or contracted responsibilities and centralized support, to ensure that responsibility and commitment to safety and marine environment protection are upheld across all parties involved.

10 Noting that definitions fall under part A, section 1, of the ISM Code, ICS believes that a change to the definition of Company would fall outside the scope of the current work. Additionally, it is believed that any substantive changes to the definition of Company would have knock-on effects on other regulations which use this definition as standard. However, it may be useful within section 2.1 of the guidelines to include the definition of "Company", thus reinforcing the relationship between the Company and Administration.

11 Any additional guidance could include reference to the Document of Compliance (DOC) holder.

Verifying compliance with the ISM Code

12 Recommendation 1 of the Study (point 13) suggests that:

"for those flag States that delegate obligations emanating from SOLAS chapter IX and the ISM Code:

- .1 strengthening flag States' oversight of delegated entities (i.e. ROs), in particular consider including provisions on feedback and reporting, taking into account other relevant IMO instruments; and
- .2 including provisions for the delegation to different ROs by Administrations of ISM and other statutory functions;"

13 In line with this recommendation, ICS believes that there is scope in the guidelines to enhance the flag States' oversight of recognized organizations (ROs) when acting on behalf of the Administration.

14 ICS has drafted points 3.1.5 and 3.1.6 with some proposals on how Administrations could ensure that ROs are periodically verified.

15 The proposed paragraph 3.1.7 addresses the potential for ROs to introduce requirements that go beyond the Code.

Sharing of best practices and lessons learned amongst stakeholders

16 As highlighted in paragraph 6.6.2 of the Study, knowledge sharing of safety information and best practices across stakeholders (companies, flag State Administrations, ROs, port State control) is very welcome from the industry. Such initiatives may include, as appropriate, the dissemination of guidance material, the organization of workshops or seminars, and the issuance of circulars highlighting effective safety management approaches identified during audits and verifications.

17 ICS has drafted paragraph 3.3.7: "These activities are aimed at supporting continuous improvement and the development of a positive safety culture within the shipping industry and should not result in the introduction of additional prescriptive requirements beyond the scope and intent of the ISM Code."

Digitalization and modernization

18 As highlighted in the additional supporting quotes for sections 5 and 6 of the Study (annex C to the Study) for paragraph 6.1.2.1 of the seafarer survey, digitalization of SMS systems is something that should be encouraged by Administrations.

19 Additionally, during its forty-ninth session, the Facilitation Committee (FAL) outlined a work plan for developing the IMO Strategy on Maritime Digitalization, which is set to be adopted by the IMO Assembly. The strategy will foster a fully interconnected, harmonized and automated global maritime sector.

20 ICS has drafted paragraph 3.3.8 to encourage Administrations to accommodate digitization and modernization where necessary.

Guidance on assessments and applications of remote audits

21 At the eleventh session of the IMO Sub-Committee on Implementation of IMO Instruments (III 11), held from 21 to 25 July 2025, the Sub-Committee agreed to the draft text of the guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications, as set out in annex 5 to document III 11/16, and invited MSC 111 and MEPC 84 to approve the guidance, as appropriate.

Safety management audits

22 ICS members consider that some limited flexibility regarding the prescribed time frame for completion of internal safety audits would enhance Companies' ability to ensure full compliance and effective implementation of the Safety Management System.

23 It has been observed that owing to vessel trading patterns and the availability of qualified audit personnel, the existing 12-month verification window may not in all cases be practicable. Accordingly, Companies are of the view that a provision should be made within the regulatory framework to permit extensions in duly justified circumstances, subject to appropriate controls and oversight.

24 ICS has drafted paragraph 4.8.4.3 to reflect this potential provision.

Corrective action follow-up

25 Recommendation 1 of the Study, part 4, proposes that the inclusion of additional provisions emphasizing the importance of timely and effective responses to corrective actions could further strengthen the implementation of the ISM Code.

26 While recognizing that corrective action constitutes a fundamental element of the ISM framework, requiring that identified non-conformities be addressed and rectified, it is acknowledged that, in certain circumstances, rectification may not be achievable within the prescribed three-month period. Such circumstances may arise owing to factors including, but not limited to, the availability of spare parts, the need for specialist maintenance services, or vessel trading patterns.

27 In such cases, ICS considers that a provision allowing for a justified extension of the corrective action time frame, subject to appropriate controls and oversight, would support practical implementation while maintaining the integrity and objectives of the ISM Code.

28 ICS has inserted additional text as paragraph 4.14.2 to reflect this.

Action requested of the Sub-Committee

29 The Sub-Committee is invited to consider the proposals contained in paragraphs 9 to 28 above and the annex.

ANNEX

PROPOSED AMENDMENTS TO THE 2023 GUIDELINES ON IMPLEMENTATION OF THE INTERNATIONAL SAFETY MANAGEMENT (ISM) CODE BY ADMINISTRATIONS

Note: The struck-out text indicates deletions and the underlined text shows additions or changes to the applicable sections of the 2023 Guidelines (resolution A.1188(33)). Grey shading is used to highlight all modifications and new insertions, including deleted text.

2 SCOPE AND APPLICATION

2.1 Definitions

The terms used in these revised guidelines have the same meaning as those given in the ISM Code.

For the purposes of the ISM Code, the term Company means the owner of the ship or any other organization or person, e.g. the manager or the bareboat charterer, who has assumed the responsibility for operation of the ship from the shipowner and who, on assuming such responsibility, has agreed to take over all the duties and responsibility imposed by the ISM Code.

3 VERIFYING COMPLIANCE WITH THE ISM CODE

3.1 General

3.1.5 Recognized Organizations (ROs), when acting on behalf of the Administration, may be authorized to carry out specific functions related to the ISM Code, such as conducting audits and issuing statutory documentation. However, the Administration retains overall responsibility and must maintain effective oversight to ensure that all delegated functions are performed in accordance with applicable international and national requirements and to the acceptable standards.

3.1.6 The Administration should periodically verify whether ROs delegated to carry out such specific functions related to the ISM Code are acting in conformity with the Administration's obligations under section 4 of these guidelines (part B of the ISM Code).

3.1.7 Administrations should ensure that verification and certification activities are strictly limited to assessing compliance with the objectives and requirements explicitly contained in the ISM Code. Additional or prescriptive requirements beyond the scope of the Code should not be imposed. The purpose of the verification is to confirm that the company's safety management system effectively achieves the objectives set out in section 1.2 of the ISM Code, without extending the interpretation or introducing national standards or criteria not foreseen by the Code.

3.3 Ability of the safety management system to meet specific requirements of safety and pollution prevention

3.3.6 Administrations should ensure that the company has:

- .1 taken into account the recommendations, as referred to in paragraph 1.2.3.2 of the ISM Code, when establishing and maintaining the safety management system; and

- .2 developed procedures to ensure that those recommendations are implemented ashore and on board¹; and

- .3 in order to foster a consistent and effective implementation of the ISM Code, Administrations should actively promote the exchange of best practices and lessons learned among Companies and Recognized Organizations.

3.3.7 Such initiatives may include, as appropriate, the dissemination of guidance material, the organization of workshops or seminars, and the issuance of circulars highlighting effective safety management approaches identified during audits and verifications. These activities should be aimed at supporting continuous improvement and the development of a positive safety culture within the shipping industry and should not result in the introduction of additional prescriptive requirements beyond the scope and intent of the ISM Code.

3.3.8 Administrations should encourage companies to accommodate digitalization and modernization of procedures where necessary.

4 CERTIFICATION AND VERIFICATION PROCESS

4.8 Safety management audits

4.8.3 Until guidance on assessments and applications of remote audits is developed by the Organization,¹ (at the eleventh session of the IMO Sub-Committee on Implementation of IMO Instruments (III 11), held from 21 to 25 July 2025, the Sub-Committee agreed to the draft text of the guidance on assessments and applications of remote surveys, ISM Code audits and ISPS Code verifications, as set out in annex 5 to document III 11/16), this case-by-case assessment should, as a minimum, address considerations such as:

4.8.4 Under normal circumstances the following should apply:

- .1 for shipboard audits, consideration may be given to the use of remote auditing methods for specified SMS activities in accordance with the Guidelines for remote ISM Code audits to be developed by the Organization,² provided that the same level of safety and assurance as that of on-site audits with the physical attendance of an auditor is ensured. In any case, initial, intermediate, renewal and additional audits on board should not be fully replaced by remote audit; and
- .2 for Company audits, consideration may be given to the use of remote auditing methods in accordance with the Guidelines for remote ISM Code audits to be developed by the Organization³; and
- .3 the Company should carry out internal safety audits on board and ashore at intervals not exceeding 12 months to verify whether safety and pollution-prevention activities comply with the safety management system. An extension of 1 month may be granted for operational or safety reasons, as appropriate, by the Administrations.

¹ Refer to guidance to be developed by the Organization.

² Refer to guidance to be developed by the Organization.

³ Refer to guidance to be developed by the Organization.

4.14 Corrective action follow-up

4.14.2 Corrective actions and any subsequent audits should be completed within the time period agreed. For corrective actions this should not normally exceed three months. The company should apply for the follow-up audits as agreed. In [exceptional] circumstances the corrective action window can be extended.
