

Preliminary Report of MSC 109

The 109th session of the IMO Maritime Safety Committee (MSC 109) was held at the IMO in London, U.K. from 2 to 6 December 2024. A summary of the outcome is given hereunder for your information.

1. Adopted mandatory requirements

Mandatory requirements adopted at MSC 109 were as follows:

(1) Amendments to IGC Code

Amendments to the IGC Code to make cargos identified as toxic products conditionally usable as fuel, in view of the launch of ammonia-fueled vessels. It was also agreed to invite a voluntary early implementation at that time.

Applied to: on or after 1 July 2026.

(2) Amendments to IGF Code

Amendments to IGF Code regarding minimum distance from bottom for suction well, etc. were approved as a part of the task for amendments to the IGF Code and development of guidelines for alternative fuels and related technologies.

Applied to: on or after 1 January 2028.

2. Approved mandatory requirements

The following draft amendments were approved at this session, and are expected to be adopted at MSC 110 to be held in June 2025.

(1) Amendments to HSC Code

Amendments to 1994 HSC Code and 2000 HSC Code regarding the numbers of lifejackets for infants and adults weighing up to 140 kg.

(2) Amendments to IGC Code

Amendments to Chapter 1 to 5, 8 to 13 and 15

to 19 of the IGC Code regarding the filling limit, special requirements for carbon dioxide, etc.

(3) Amendments to SOLAS regulation II-1

Amendments to SOLAS regulation II-1/56 to add gaseous fuels irrespective of flashpoint to application of IGF Code. (See also 6.)

3. Approval of unified interpretations, etc.

The following unified interpretations (UIs), guidelines and guidance etc. were approved during MSC 108.

3.1 Unified interpretations

(1) Unified interpretation of SOLAS regulation III/20.8.4 and 20.11, and resolution MSC.402(96)

Unified interpretation of SOLAS regulation III/20.8.4 and 20.11 to clarify that SOLAS regulation III/20.11 and resolution MSC.402(96) should also be applicable to inflated rescue boats

(2) Unified interpretation of SOLAS regulation II-2/4.5.6.1 and 20.11, and paragraph 3.1.2, 3.1.4 and 3.5.3 of the IBC Code

Unified interpretation of SOLAS regulation II-2/4.5.6.1 and 20.11, and paragraph 3.1.2, 3.1.4 and 3.5.3 of the IBC Code regarding gas-freeing air-supply piping system located in the forecastle area

(3) Unified interpretation of SOLAS regulation II-2

1. Unified interpretation of SOLAS regulation II-2/4.5.3.2.2 and 11.6.3.2 regarding the setting of the pressure alarm for tankers

that apply pressure sensors; and

2. Unified interpretation of SOLAS regulation II-2/11.4.1 regarding the definition of crowns for machinery spaces of category A

(4) Unified interpretation of SOLAS regulation II-1

Unified interpretation of SOLAS regulation II-1/26.2 regarding the reliability of single essential propulsion components

3.2 Guidelines and guidance etc.

(1) Revised standards for the design, testing and locating of devices to prevent the passage of flame into cargo tanks in tankers

Amendments to standards for the design, testing and locating of devices to prevent the passage of flame into cargo tanks in tankers (MSC.1/Circ.677) to incorporate the previous amendment made (MSC.1/Circ.1324) and updating references.

(2) Interim guidelines for ships using ammonia as fuel

Interim guidelines for ships using ammonia as fuel, as a part of the task for amendments to the IGF Code and development of guidelines for alternative fuels and related technologies. The interim guidelines do not address ships using ammonia cargo as fuel.

4. Goal-based Standards (GBS)

GBS, as stipulated in SOLAS II-1/3-10, is applied to oil tankers and bulk carriers of more than 150m in length*. Design and construction of these ships shall comply with rules deemed as compliant with GBS.

Further, GBS requires maintenance of verification to the rules as conforming to the goals and functional requirements of GBS based on the GBS Verification Guidelines (MSC.454(100)).

At this session, the GBS audit report and actions taken by the IACS for the 2022 amendments to IACS Recommendation No.34 (Rec.34/Rev.2), which provides wave scatter diagram to be used as the basis for the IACS Common Structural Rules (CSR) were considered, and it was agreed to add more detailed information about the wave data.

5. Consideration of requirements for Maritime Autonomous Surface Ships

(MASS)

In the recent development of MASS, it has been discussed at MSC on an international instrument of MASS (MASS Code). Non-mandatory MASS Code mainly on goal and functional requirements for items such as safety, operation, security, etc. is currently under consideration. Results of deliberations at the previous session, it is planned to finalize the non-mandatory MASS Code at MSC 110 scheduled to be held in May 2025, and after the development of the non-mandatory MASS Code and adopt a mandatory MASS Code by 2030.

At this session, based on the report by the intersessional working group meeting held in September 2024, chapters of Risk Assessment, Connectivity, and Remote Operations were finalized. In addition, the future work plan was reviewed, and it was agreed that an intersessional working group meeting will be held in 2025, and that the non-mandatory MASS Code will be finalized at MSC 111, scheduled for 2026. There will be no changes regarding the mandatory MASS Code, i.e. it will be considered after the development of the non-mandatory MASS Code, with a view to adoption by 2030.

At this time, the structure of the non-mandatory MASS Code will be as follows.

Part 1: Introduction (purpose and application of the code)

Part 2: Main principles for MASS and remote operations centres (ROC) functions (certificate and survey, approval process, risk assessment, operational context, human element, etc.)

Part 3: Specific requirements (functional requirements and expected performance for each detailed item such as navigation and remote operations)

6. A safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels

At MSC 107, identification and updating a list of new technologies and alternative fuels to reduce greenhouse gas (GHG) emissions and their technical assessment, as well as a review of safety obstacles and gaps in the current IMO instruments that may impede the use of the alternative fuel or new technology, were initiated. The correspondence group is working to update the list and is supposed to report to MSC 110.

In addition, it was proposed that the IGF Code should also apply to gaseous fuels irrespective of flashpoint by the Sub-Committee on Carriage of Cargoes and Containers held in September 2024 (CCC 10). At this session, amendments to SOLAS II-1/56 to apply the IGF code to all gaseous fuels, not just low-flashpoint fuels, was approved. It is expected to be adopted at MSC 110.

7. **Cyber risk management**

In view of the growing importance of cyber security on board ships and the need for security risk countermeasures, the non-mandatory guidelines on maritime cyber risk management (MSC-FAL.1/Circ.3/Rev.2) have been developed.

At the previous session, a draft amendment to the guidelines in light of the increased use of cyber-connected systems in recent years were agreed. The draft amendment to the guidelines will be approved by subsequent 49th session of the Facilitation Committee (FAL 49) and published as an MSC-FAL Circular.

At this session, it was agreed to the need to further develop cybersecurity standards for ships and port facilities as next steps to enhance maritime cybersecurity and also agreed to extend the target completion of the output on this agenda item to year 2026 to further discussion.

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