



ANALYSIS OF CONSOLIDATED AUDIT SUMMARY REPORTS

Enhancement of the IMSAS audit coverage in respect of port State control officer qualification and oversight

Submitted by IUMI, IACS and P&I CLUBS

SUMMARY

Executive summary: This document comments on the discussion in documents III 12/9 and III 12/INF.5, and invites the Sub-Committee to consider whether the existing IMSAS audit treatment of port State control officer (PSCO) qualification and oversight could be clarified and applied more consistently within the current framework. It draws on recurring audit themes identified by the Secretariat in document III 10/INF.6 and on practical experience of classification societies of the operational uncertainty arising where inspection practices are not consistently supported by effective PSCO qualification, updating and oversight arrangements.

Strategic direction, if applicable: 1

Output: 1.4

Action to be taken: Paragraph 17

Related documents: III 10/INF.6; III 12/9 and III 12/INF.5

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.7), and comments on the discussion in documents III 12/9 and III 12/INF.5 (Secretariat).

2 Resolution A.1211(34) on the *Framework and procedures for the IMO Member State Audit Scheme* provides that the purpose of the IMSAS framework is to describe the objective, principles, scope, responsibilities and capacity-development aspects of the IMO Member State audit, and that the audit standard is the III Code. The same resolution states that the audit is intended to determine the extent to which Member States are implementing and enforcing the applicable IMO instruments, and that the minimum scope of an audit includes, inter alia, implementation and enforcement, control and monitoring mechanisms, and inspection-related functions.

3 Under the III Code, the relevant obligations concerning PSCOs arise in the Member State's capacity as a port State. In particular, paragraphs 60 to 63 of the Code require the port State to establish processes to administer a PSC programme to ensure that PSC is carried out only by authorized and qualified PSCOs, and that PSCOs are free from improper influence, and to evaluate port State performance periodically.

4 Resolution A.1206(34) on the *Procedures for Port State Control, 2025* states that the procedures are intended to provide basic guidance and to afford consistency in the conduct of PSC inspections, recognition of deficiencies and application of control procedures. The resolution further provides that PSC should be carried out only by qualified PSCOs; that a PSCO should be an experienced officer qualified as a flag State surveyor; that training should take into account the latest IMO model courses for PSC; and that periodic seminars should be held to update PSCO knowledge.

5 This document is submitted as a constructive implementation suggestion drawing on practical experience of classification societies, members of IACS, and on the recurring audit themes identified by the Secretariat in documents III 10/8, III 10/INF.6, III 12/9 and III 12/INF.5. The document is not intended to comment on any individual port State control decision or on the performance of any regional PSC regime. Rather, it invites consideration of whether IMSAS audit tools could more explicitly and consistently examine the national systems through which PSCOs are selected, trained, authorized, updated and overseen.

Background

6 Documents III 12/9 and III 12/INF.5 update the earlier analysis in document III 10/INF.6 and analyse nine consolidated audit summary reports from 112 audits conducted between 2016 and 2024. The document explains that the analysis is based on findings and observations from those audits and examines recurring themes by reference to the structure of the III Code.

7 In the port States section of the updated analysis, document III 12/INF.5 records 292 findings, of which 143 findings (49%) relate to implementation, 84 findings (28.8%) to enforcement and 65 findings (22.3%) to evaluation and review. The analysis also notes that many of these findings relate to reception facilities and operational procedures, training of port State control officers, requirements of the IMDG and IMSBC Codes and the register of fuel oil suppliers (III 12/INF.5, annex, paragraphs 43 to 45).

8 The updated analysis also identifies recurring shortcomings in broader implementation and enforcement themes, including "qualified personnel and training" (61 instances) and "establishing processes of PSC" (36 instances), with related root causes including gaps in awareness, interpretation, technical guidance, technical capability and training programmes (III 12/INF.5, annex, table 1 and figure 23).

9 An analysis of 516 distinct deficiency codes, systematically categorized across 17 regulatory frameworks representing the breadth of international maritime conventions enforced through PSC inspections conducted by co-sponsors, clearly distinguishes between deficiency types which are largely objective (such as documentary absence, expired certification or clearly inoperative equipment) and those requiring a greater degree of professional judgement (such as functional testing, interpretation of equivalencies, assessment of "serious deterioration" or attribution of responsibility). For deficiency types involving a higher degree of professional judgement or a greater level of subjectivity, PSCO training and qualification requirements should extend beyond generic familiarization. Training should incorporate scenario-based exercises, calibration seminars and detailed guidance on evidencing, escalation and supervisory review. Such measures would support greater consistency in the assessment of similar situations across officers and ports, while ensuring alignment with the control measures established in the Procedures for Port State Control.

10 Where PSCO qualification, technical updating or oversight arrangements are uneven, similar technical or operational situations may be handled differently from port to port or officer to officer. This can create uncertainty for masters, companies, recognized organizations (RO) and Administrations when deciding the expected corrective action, provision of evidence and whether a matter reflects a ship-specific deficiency, a survey or certification issue, or a difference in inspection practice.

11 From the perspective of co-sponsors, PSC inspections increasingly require technically detailed analysis, including the interpretation of equipment standards, approved arrangements, certificates, electronic documentation, RO/classification society evidence, crew demonstration and operational readiness. The examples below are not cited to question the merits of individual PSC decisions, but to illustrate the type of cases where consistent PSCO qualification, technical updating, access to guidance and supervisory review are important to achieve predictable, fair and safety-focused outcomes:

- .1 In relation to VDR/S-VDR and navigation equipment, PSC findings may require a PSCO to determine the applicable performance standard by reference to the ship's construction date, equipment installation date, approval basis, flag Administration position and relevant interpretations. A detention-review case concerning VDR/S-VDR shows that disagreement may arise between the port State and flag State on whether newer or earlier performance standards applied to the equipment fitted on board. This illustrates the need for PSCOs to be trained and supported in applying technical standards and in identifying when flag Administration or RO/classification society clarification is relevant before a matter is escalated (*Tokyo MoU, Summary of Detention Case 27-02-2016*).
- .2 In relation to fire detection and cargo-hold smoke-detection systems, PSC findings may involve assessment of system design, functional status, alarms during cargo operations, crew response, RO/classification society observations and the threshold between a deficiency and a detainable deficiency. In another detention-review case, the Tokyo MoU detention review panel considered that further investigation should have been carried out before detention, and that it was not appropriate, based on the facts, to conclude that there had been substantial deterioration of the fire-detection system. This type of case demonstrates why PSCOs need adequate technical updating, practical guidance and supervisory review when assessing complex equipment faults and determining the appropriate control action (*Tokyo MoU, Summary of Detention Case 25-04-2015*).
- .3 In relation to electronic statutory and classification certificates, IMO guidance recognizes that electronic certificates should facilitate acceptance and reduce administrative burden, but also records that ships have experienced instances in which port State control officers or other stakeholders have denied the validity of such certificates. Industry guidance has similarly reported PSC interventions and fines where the authenticity of electronic certificates could not be verified during onboard inspections. These examples show that PSCOs need current training on electronic certificate verification, including the use of unique tracking numbers, QR codes, verification websites, GISIS information and onboard verification instructions (FAL.5/Circ.39/Rev.2 and Gard, "*Verification of electronic statutory and class certificates*", 18 January 2022).

Discussion

12 In view of these practical implications, the purpose of this document is to invite the Sub-Committee to consider whether IMSAS audit coverage could be enhanced, within the existing framework, so that audits more explicitly examine whether an IMO Member State, in its port State capacity, maintains effective arrangements for:

- .1 PSCO selection criteria and authorization;
- .2 initial and refresher training;
- .3 competence maintenance and technical updating;
- .4 safeguards for independence and freedom from improper influence;
- .5 performance monitoring and review; and
- .6 use of review outcomes to support improvement and consistency.

13 These subjects are already connected to the existing obligations of the port State stated in the III Code and to the qualification and training provisions in the *Procedures for Port State Control, 2025* (resolution A.1206(34)).

14 It is considered that more explicit audit prompts would help IMO and Member States to identify whether the difficulty lies in the absence of national procedures, gaps in training or refresher training, inconsistent authorization, limited monitoring of inspection quality or insufficient feedback from review outcomes. The approach would support more targeted capacity-development and promote a common understanding of what constitutes an effective national PSC competence-management system.

Proposal

15 It is suggested that the matter could be taken forward in a measured manner, beginning with the clarification of audit tools and reference materials and thereafter considering whether any limited refinement of the IMSAS framework is necessary. This would be proportionate to the recurring audit themes identified in documents III 12/9 and III 12/INF.5 and consistent with the supportive and improvement-oriented nature of the IMSAS.

16 As an initial step, the Sub-Committee may wish to review the existing State audit questionnaire in the annex, appendix 2, to resolution A.1211(34), associated audit guidance and related supporting material, with a view to considering whether the audit treatment of PSCO qualification and oversight in the port State area could be made more explicit and more consistent. This could help clarify, within the existing framework, the types of national arrangements and evidence that may be relevant to an effective PSC competence-management system.

Action requested of the Sub-Committee

17 The Sub-Committee is invited to consider the foregoing, in particular the proposals in paragraphs 15 and 16, and take action, as appropriate.