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**WORKING DOCUMENT**

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From: General Secretariat of the Council  
To: Delegations

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Subject: 12th meeting of the Sub-Committee on Ship Design and Construction  
(London, 19-23 January 2026)  
- Non-paper from the Commission drafted to facilitate EU co-ordination

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**DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (30.01.2026)**

Delegations will find attached a non-paper from the Commission drafted to facilitate co-ordination between the EU Member States and the Commission in respect of the subject mentioned above<sup>1</sup>.

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<sup>1</sup> It is the intention of the Presidency to ensure the necessary co-ordination of the Member States' positions on the spot on the basis of the discussion of this paper.

NON-PAPER

**ON THE POSITION OF THE EUROPEAN UNION FOR THE  
TWELFTH SESSION OF THE  
IMO SUB-COMMITTEE ON SHIP DESIGN AND CONSTRUCTION (SDC 12)  
(19 - 23 JANUARY 2026)**

The annotated agenda is presented to the Council with the view to establishing the EU positions on agenda items for the 12<sup>th</sup> session of the IMO Sub-Committee on Ship Design and Construction (SDC 12).

This document lists all received documents<sup>2</sup> on issues of EU relevance.

The comments by the Commission are printed in *italics*. The proposed position of the Union is printed in ***bold italics***.

Should Member states wish to express a position on matters not covered by the Union position, in accordance with the principle of loyal cooperation they shall refrain from any measure that may jeopardise the attainment of the Union's objectives.

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<sup>2</sup> Based on documents received up to 17 December 2025.

## **Agenda item 1 – Adoption of the agenda**

**Docs:** SDC 12/1, SDC 12/1/1/Rev.1-2

SDC 12/1 (Secretariat): provides the provisional agenda of the 12<sup>th</sup> session of the Sub-Committee.

SDC 12/1/1/Rev.1 (Secretariat): provides information on the actions the Sub-Committee will be invited to take on the provisional agenda items of its twelfth session set out in document SDC 12/1.

SDC 12/1/2 (Secretariat): Arrangements for working, experts and drafting groups at SDC 12. (*not issued yet*)

*In accordance SDC 12/1/2, the Sub-Committee is expected to establish the following working groups and drafting groups at this session:*

- a) *Working Group 1 on AI 3 (Safe Return to Port (SRP)); AI 6 (ECRAM); and AI 12 (MODU Code Electrical Equipment after Shutdown);*
- b) *Working Group 2 on AI 7(FRP); AI 14 (Plastic Pipes); AI 13 (Chapter 15 FSS Code (Nitrogen Receiver/Generator));*
- c) *Working Group 3 (WG3) on AI 9 (GHG Safety);*
- d) *Expert Group (EG) on AI 8 (URN); and*
- e) *Drafting Group (DG) on AI 4 (2011 ESP Code - RIT Guidelines).*

## **Agenda item 2 – Decisions of other IMO bodies**

**Docs:** SDC 12/2

SDC 12/2 (Secretariat): references the decisions made by SSE 11, MEPC 83, MSC 110, III 11 and CCC 11, relevant to the work of the Sub-Committee.

*The Sub-Committee will be informed of relevant decisions and actions taken by other Committees and Sub-Committees, and any required take action at this session will be considered under the relevant agenda items.*

## **Agenda item 3 – Revision of the Interim explanatory notes for the assessment of passenger ship systems' capabilities after a fire or flooding casualty (MSC.1/Circ.1369) and related circulars**

**Docs:** SDC 12/3(Rev.1), SDC 12/3/1

SDC 12/3(Rev.1) (Norway as coordinator of the Correspondence Group): provides the report of the Correspondence Group on the Revision of the Interim Explanatory Notes for the Assessment of Passenger Ship Systems' Capabilities After a Fire or Flooding Casualty (MSC.1/Circ.1369).

SDC 12/3/1 (China): contains comments on appendix 1 of the Explanatory Notes in the report of the Correspondence Group on the Revision of the Interim Explanatory Notes for the Assessment of Passenger Ship Systems' Capabilities After a Fire or Flooding Casualty (MSC.1/Circ.1369) (SDC 12/3) and proposes relevant suggestions.

### EU relevance

*This issue falls under exclusive Union competence.*

*Article 6(2)(a)(i) of Directive 2009/45/EC of the European Parliament and of the Council of 6 May 2009 on safety rules and standards for passenger ships establishes that passenger ships of Class A are to comply entirely with the requirements of the 1974 SOLAS Convention, as amended. This Agenda item concerns the 'safe return to port' (SRtP) concept, which is referred to in SOLAS in chapters II-1 and II-2. Therefore, any changes to the Revision of the Interim Explanatory Notes for the Assessment of Passenger Ship Systems' Capabilities After a Fire or Flooding Casualty (MSC.1/Circ.1369) would affect the implementation of SOLAS, and consequently the implementation of the Directive.*

### Background

*The concept of 'safe return to port' (SRtP) was introduced in SOLAS in 2006 when MSC 82 adopted amendments to SOLAS chapters II-1 and II-2. These new regulations are applicable to passenger ships, as defined in SOLAS II-2/21.1, constructed on or after 1 July 2010. To provide additional guidance for the uniform implementation of such regulations, MSC developed the Interim Explanatory Notes for the assessment of passenger ship systems' capabilities after a fire or flooding casualty (MSC.1/Circ.1369), as amended by MSC.1/Circ.1369/Add.1, (hereunder referred to as 'Explanatory Notes') and which are referenced through footnotes in SOLAS regulations II-1/8-1, II-2/21.4 and II-2/22.3.*

*Eventually, MSC 103 approved a new output to revise the Explanatory Notes. **DELETED** SDC 9 and 10 made considerable progress on the review of the Explanatory Notes and agreed on the development of a new structure of the Explanatory Notes, including for appendix 1. As regards to the draft amendments to the Explanatory Notes, it was agreed that the STCW regulations should not be duplicated in the Explanatory Notes, but there may be a need to consider new model courses from the perspective of safe return to port once the revision of Explanatory Notes has been progressed further. As regards the impact that alternative fuels and technologies could have on the safe return to port, the Sub-Committee agreed that it should not, at this stage, embark on a detailed consideration on alternative fuels and technologies, but it could start a general discussion on their implications.*

*SDC 11 finalised, in principle, the main part of the draft revised Explanatory Notes, however additional work remained. Therefore, the Sub-Committee agreed to re-establish the Correspondence Group on Revision of the Interim Explanatory Notes (MSC.1/Circ.1369), under the coordination of Norway with a view to finalize the interpretations in appendix 1 of the draft revised Explanatory Notes, appendix 2 of the draft revised Explanatory Notes, as well as to consider consequential draft amendments to the related circulars.*

### Consideration at SDC 12

Norway, as the coordinator of the correspondence group, reports in SDC 12/3(Rev.1) that the Group has finalised the revision of Interim Explanatory Notes (MSC.1/Circ.1369). Therefore, the Group is proposing to establish a drafting group at this session to review the work with a view to finalisation at this session and approval at MSC 111, and to provide the revised Explanatory Notes and the list in paragraph 13, of the report, to the HTW and III Sub-Committees for their consideration.

In SDC 12/3/1, China proposes alternative text to paragraphs 5.3.1.1 and 5.6.1.1 of appendix 1 of the draft revised Explanatory Notes as set out in SDC 12/3(Rev.1). Despite the intention, the proposed alternative text for paragraph 5.3.1.1 is not fully consistent with SOLAS regulation V/19.2.1, which requires “a properly adjusted standard magnetic compass, or other means, independent of any power supply to determine the ship's heading and display the reading at the main steering position”. As regards paragraph 5.6.1.1, the proposed alternative text seems incomplete as it only covers points 3 and 4 of those contained in the original paragraph 5.6.1.1 of appendix 1 of the draft revised Explanatory Notes as set out in SDC 12/3(Rev.1). **DELETED**

#### **Agenda item 4 – Amendments to the 2011 ESP Code**

**Docs:** SDC 12/4, SDC 12/4/1, SDC 12/INF.21

SDC 12/4 (IACS as coordinator of the correspondence group): provides the report of the Correspondence Group on the Development of Guidelines on the Use of RIT for 2011 ESP Code Surveys.

SDC 12/4/1 (China): proposes amendments to the 2011 ESP Code, specifying ultrasonic testing as an equivalent method to the hose test for hatch cover tightness inspection, removing the "oiltight" requirement and harmonizing fracture detection procedures.

SDC 12/INF.21 (China): presents the experimental research results of two methods, namely ultrasonic testing and hose testing, for verifying the tightness of bulk carrier hatch covers.

### EU relevance

*This issue falls under Union exclusive competence.*

*Amendments to the International Code on the Enhanced programme of inspections during surveys of bulk carriers and oil tankers, 2011 (2011 ESP Code) affect the application of Regulation (EU) No 530/2012 of the European Parliament and of the Council on the accelerated phasing-in of double-hull or equivalent design requirements for single-hull oil tankers. Therefore, any changes to the 2011 ESP Code would affect EU legal acts.*

### Background

*The main issue for consideration under this Agenda item at SDC 10, was the proposal by IACS (SDC 10/6) to amend the 2011 ESP Code to regulate the use of remote inspection techniques (RIT) to support the surveyor when conducting close-up surveys of existing bulk carriers and oil tankers. It should be recalled that RIT is different from remote surveys which is being discussed within the MSC and the III Sub-Committee. RIT involves having a surveyor on onboard but employing technology to assist him/her to carry out close up surveys. Therefore, RIT should be considered as supplementing on-site physical surveys.*

*Following a discussion, SDC 10 agreed, in principle, to use RIT to support the close-up surveys of bulk carriers and oil tankers under the ESP Code. Therefore, the Sub-Committee established the Correspondence Group on Amendments to the ESP Code to permit the use of RIT and instructed it to finalize the draft amendments to the ESP Code, based on document SDC 10/6, and to develop guidelines on RIT under the ESP Code, which may be used by the Organization as a template for more holistic guidelines in the future.*

*SDC 11 agreed to, the draft amendments to the 2011 ESP Code to permit the use of RIT, and associated draft MSC resolution. These were approved MSC 110 with a view to adoption by MSC 111. In relation to the guidelines on the use of RIT for 2011 ESP Code surveys, MSC 110 endorsed SDC 11's decision in not including specific provisions on "legal liability" as part of the amendments to the 2011 ESP Code, nor in the draft guidelines. The Sub-Committee also agreed to re-establish the Correspondence Group on the Development of guidelines on the use of RIT for 2011 ESP Code surveys, under the coordination of IACS, to finalise the development of guidelines on the use of RIT for 2011 ESP Code surveys. It was noted that the Guidelines should be in place by the entry into*

force of the amendments to the 2011 ESP Code, to ensure a standardized and safe approach of the use of RIT for 2011 ESP Code surveys.

### Consideration at SDC 12

SDC 12/4 (IACS as coordinator of the correspondence group) provides the report of the Correspondence Group on the Development of Guidelines on the Use of RIT for 2011 ESP Code Surveys. The report notes that considerable progress has been achieved in the development of the Guidelines, but a number of issues were still open for discussion. Therefore, the Group is recommending that the draft Guidelines are further discussed by a Working Group. However, the Chair in SDC 12/1/2 indicated that it would be more appropriate to have a drafting group. **DELETED**. It should be noted that these guidelines need to be completed at this session since they would have to be approved as a package with the actual ESP Code amendments which will be adopted in May 2026. In relation to the actions requested of the Sub-Committee (Paragraph 27), the following should be taken into consideration:

1 Support the group report.

2 Following the SDC 11, the 2011 ESP CODE amendments required that “RIT surveys shall be carried out in accordance with the requirements given herein and the guidelines on the use of RIT”. Therefore, it should be clear that the ESP Code makes the guidelines mandatory. This will avoid inconsistencies and unintended interpretations of the guidelines, or non-application of part of it, with a possible impact in the ESP Code safety principles and safeguards (paragraph 20);

3 The topic should be further discussed in the drafting Group. Support the inclusion for the invitation to the Administrations on sharing experience on the use of RIT this will ensure the consistency and enable the exchange of information and experience within the Maritime community (paragraph 21);

4 The use of new technologies and sensor to provide supplementary information should not be within the guidelines due to the extensive verity of equipment and present uncertainties on their use and validation process within the RIT systems. The use “post-processing” option should be avoided as it may lead to misinterpretations that the RIT can be used and the reports would be submitted after the inspection to the surveyor to accept the close-up survey.

As proposed in point 3 above, new technologies and sensor should be considered by the Administrations, tested and the experience shared to ensure the consistency and enable the exchange of information and experience within the Maritime community (paragraph 25);

5 Support the re-establishment of a group to further discuss and develop guidelines on the use of RIT for 2011 ESP Code Surveys, with a view to finalization (paragraph 26);

In relation to the items to be noted for further consideration (paragraphs 20 to 25), the following should be taken in consideration:

Paragraph 22 - The proposed use of the "Pre-Inspection Verification Card", should be the only minimum requirement required in the guidelines in order to maintain a consistent standard and ensure that, regardless of the RIT firm or system employed, the results achieved remain harmonized. The flexibility to allow ‘appropriate means’ **should not be** included in the guidelines,

*this may lead to uncontrolled interpretations on the application of the guidelines with a possible impact in the ESP Code safety principles and safeguards.*

*Paragraph 23 – Support the proposed actions.*

*Paragraph 24 – The cameras and visualization screens should have a prescribing a minimum resolution. The topic should be further discussion and consideration by the ESP Working Group.*

*In SDC 12/4/1 and SDC 12/INF.21, China proposes amendments to the 2011 ESP Code to include ultrasonic testing as an equivalent method to the hose test for hatch cover tightness inspection, to remove the reference to the term "oiltight", and to harmonize the fracture detection procedures*

**DELETED**

**Agenda item 5 – Revision of SOLAS chapters II-1 (part C) and V, and related instruments regarding steering and propulsion requirements, to address both traditional and non-traditional propulsion and steering systems**

**Docs:** SDC 12/5, SDC 12/5/1-4, SDC 12/INF.10/Corr.1, SDC 12/INF.18

SDC 12/5 (United States): proposes modifications to the draft texts developed at SDC 11 by the Experts Group in document SDC 11/WP.7. The proposed measures risk imposing significant economic burdens on the shipping industry and its customers, driving inflation for consumers.

SDC 12/5/1 (Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Latvia, Lithuania, Luxembourg, Malta, Netherlands (Kingdom of the), Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and European Commission): presents the ongoing works, according to the road map in annex 5 to document SDC 11/WP.7, on Revision of SOLAS chapters II-1 (part C) and V, and

related instruments, regarding steering and propulsion requirements, to address both traditional and non-traditional systems.

SDC 12/5/2 (China): proposes five amendments to the draft International Standards for Ship Manoeuvrability: (1) adjustment of the terminology and scope covering other propulsion and steering systems; (2) further verification of the method of testing and criteria for ships equipped with non-traditional propulsion and steering systems; (3) deletion of the heading keeping test; (4) determination of the upper limits of advance and tactical diameter in the turning circle manoeuvre according to different ship types and reduced conditions; and (5) deletion of stopping ability tests for ships under reduced conditions and for those equipped with non-traditional propulsion and steering systems.

SDC 12/5/3 (Japan): presents practical calculation examples of the draught correction coefficient (F/B) using the equation of longitudinal motion (EOLM) method.

SDC 12/5/4 (ASEF): provides comments on document SDC 12/5/1 regarding the evaluation of full astern stopping performance. Future engine design trends driven by environmental requirements may affect stopping characteristics. This document supports, therefore, the direction indicated in document SDC 12/5/1 to consider the influence of coasting distance when assessing stopping test results.

SDC 12/INF.10/Corr.1 (Japan and Norway): provides information on possible evaluation methods for stopping test results, as a follow-up to document SDC 11/INF.2, focusing on coasting distance correction and draught correction.

SDC 12/INF.18 (Republic of Korea): provides information on recent manoeuvring trial data to support the review of resolution MSC.137(76) based on the road map in document SDC 11/WP.7 for both traditional and non-traditional propulsion and steering systems.

### EU relevance

*This issue falls under Union exclusive competence.*

*In the EU, SOLAS is applied to passenger ships engaged on domestic voyages through Directive 2009/45/EC on safety rules and standards for passenger ships. Pursuant to Article 6(2)(a)(i) of this Directive, new passenger ships of Class A shall comply entirely with the requirements of the 1974 SOLAS Convention, as amended, and with the specific relevant requirements specified in this Directive. Therefore, any changes in respective SOLAS regulation(s) would affect Union common rules set out in this Directive.*

### Background

*MSC 105 agreed with the proposal in MSC 104/15/8 (EU, United States and IACS) to establish a new output on "Revision of SOLAS chapters II-1 (Part C) and V, and related non-mandatory instruments, to address both traditional and non-traditional propulsion and steering systems". It should be noted that the EU had further elaborated on the initial proposal (MSC 104/15/8) through document MSC 105/18/1 by providing the suggested amendments to SOLAS chapters II-1 (Part C) and V, and related non-mandatory instruments, taking into consideration the conclusions of the*

*"STEERSAFE Steering and Manoeuvrability Study" commissioned by EMSA and carried out by Det Norske Veritas (DNV).*

*In view of the fact that the new output had synergies with the SDC's agenda item on the "Safety objectives and functional requirements of the guidelines on alternative design and arrangements for SOLAS chapter II-1" (particularly as regards the functional requirements and expected performances of regulations II-1/28, II-1/29 and II-1/30 on steering and propulsion), as well as taking into account the excessive workload of the Sub-Committee, SSE 9 proposed to transfer it to the SDC 10's provisional agenda. Subsequently, MSC 107 endorsed this proposal.*

*At SDC 10, the main issue for consideration was whether the revision of SOLAS chapters II-1 (part C) and V should include revising the requirements for traditional propulsion system. Japan, supported by other delegations, maintained that there was no justification for changing the requirements for traditional propulsion system, and the Sub-Committee should concentrate only on non-traditional propulsions. They argued that there were no serious incidents involving ships with traditional propulsion systems. **DELETED** Union submission MSC 105/18/1 had already identified the areas for improvement, including to make the text technology neutral. It was explained that the proposed amendments, set out in MSC 105/18/1, are based on the results of the previously referred "STEERSAFE" study.*

*The Chair concluded that existing regulations were very prescriptive **DELETED**. The fundamental question was whether all regulations should be GBS based or GBS should be applied only to regulations dealing with non-traditional propulsion and steering systems. Treating the two parts separately could create inconsistencies so, finally, it was agreed that all regulations will be amended following the GBS approach, Tiers I and II will be common for both type of systems. As regards the Tier IV (prescriptive requirements), they will apply to any system in principle, but all the requirements will be analysed one by one (within the working/correspondence groups) in order to decide if any differentiation on particular issues should be established. In view of the many remaining issues, the Sub-Committee re-established the Correspondence Group under the coordination of Japan.*

*For SDC 11, the Union submitted SDC 11/8/5 supporting the need to set mandatory requirements on ship manoeuvrability performance as per resolution MSC.137(76) and on availability of information on-board about ship's manoeuvring characteristics as per resolution A.601(15). A similar submission was made by Norway (SDC 11/8/4). **DELETED***

On this basis, the Sub-Committee agreed to the road map for completing the work by 2028. The Sub-Committee also agreed, in principle, with the draft of new regulations II-1/28-1 and 29-1. Most of the comments contained in the EU submission (SDC 11/8/5) were accepted. Therefore, it was agreed that there was no need to re-establish the correspondence group. As regards the work to be done, it was agreed that Japan, NO and EC would collaborate to prepare the submissions indicated in the roadmap. The EC, assisted by EMSA, would act as the coordinator of the submission. Subsequently, MSC 110 agreed to extend the target completion year of the output from 2025 to 2028, with a view to ensuring an entry into force of the new SOLAS regulations by 2032.

### Consideration at SDC 12

As reported above, EMSA, on behalf of the EC, has coordinated with Norway and Japan in drafting SDC 12/5/1 (Austria et al) describing the ongoing work for establishing mandatory international standards for ship manoeuvrability (ISSM) as well as updating the related road map for completing such work. **DELETED** It is worth noting that, as indicated in paragraph 9.1 of the submission, the update of the annexes to document SDC 11/WP.7 (report of the Expert Group established at SDC 11) shall be submitted to SDC 13 in a similar joint submission.

The USA, in SDC 12/5, proposes further amendments to the annexes to document SDC 11/WP.7 of different nature: some are minor details and adjustments which might be accepted but, in some other cases (e.g. amendments in paragraphs 8.3.2.1 and 9.1.2 of regulation 29-1), they lead to a reduction of the safety level and therefore cannot be accepted.

China, in SDC 12/5/2, proposes further amendments to the "the draft ISSM", annex 4 to document SDC 11/WP.7, as well as consequential amendments to Annexes 1 and 2, which are summarized and commented as follows:

- Adjustment of the terminology and scope by both exclusion of water jet propulsion and consideration of gate rudders as traditional propulsion and steering systems (par. 3-5 and 20.1). **DELETED**
- Further verification of the method of testing and criteria for ships equipped with non-traditional propulsion and steering systems (par. 6-8 and 21). **DELETED**
- Deletion of the heading keeping test (par. 9-10 and 20.2). **DELETED**
- Develop separate standards, in view of significantly different percentage increase in advance and tactical diameter in the turning circle manoeuvre under reduced conditions, among ship types (single and twin-propeller/rudder ships) (par. 11-14 and 20.3) **DELETED**

- **DELETED**

- *Deletion of stopping ability tests for ships under reduced conditions and for those equipped with non-traditional propulsion and steering systems (par. 15-18 and 20.4).* **DELETED**

*In addition, the following documents have been submitted:*

- *SDC 12/5/3 (Japan) provide comments on the EU submission SDC 12/5/1 (Austria et al) by focusing on the draught correction methodology (section 3.3 of Annex 1 to SDC 12/5/1), when applied to evaluate the ship stopping performance, and presents practical calculation examples performed according to the method described in SDC 12/INF.10/Corr.1 (Japan and Norway).*
- *SDC 12/5/4 (ASEF) provide comments on the EU submission SDC 12/5/1 (Austria et al) by focusing on the effect of the coasting distance in the evaluation of stopping test results (sections 2.2.1.2 and 3.4.1 of Annex 1 to SDC 12/5/1).*
- *SDC 12/INF.10/Corr.1 (Japan and Norway) provides relevant information on possible evaluation methods for stopping test results based on the equation of longitudinal motion (EOLM).* **DELETED**
- *SDC 12/INF.18 (Republic of Korea) provides, as requested by the Sub-Committee, relevant information on manoeuvring trial data.*

**DELETED**

**DELETED**

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**Agenda item 6 - Development of engine control room alert management (ECRAM) performance standards**

**Docs:** SDC 12/6, SDC 12/6/1-2, SDC 12/INF.23

SDC 12/6 (Norway): provides a proposal for a base document to be used in the discussions for the development of engine control room alert management (ECRAM) performance standards.

SDC 12/6/1 (CLIA and IMPA): proposes a road map and approach for developing a comprehensive performance standard for engine control room alert management (ECRAM).

SDC 12/6/2 (China): provides comments on document SDC 12/6 and proposes improvements.

SDC 12/INF.23 (Denmark): shares an analysis of shipborne alarm data against the IEC 62682:2014 performance metrics.

EU relevance

*This issue falls under Union exclusive competence.*

*Article 6(2)(a)(i) of Directive 2009/45/EC on safety rules and standards for passenger ships applies SOLAS, as amended, to Class A passenger ships. In addition, resolution MSC.302(87) on the adoption of performance standards for bridge alert management, which is intended to harmonize the priority, classification, handling, distribution and presentation of alerts for the bridge, is referred to in the Annex to Commission Implementing Regulation (EU) 2025/1533 of 23 July 2025 laying down rules for the application of Directive 2014/90/EU of the European Parliament and of the Council, as regards design, construction and performance requirements and testing standards for marine equipment and repealing Commission Implementing Regulation (EU) 2024/1975. This issue therefore falls within the scope of Directive 2014/90/EU of the European Parliament and of the Council of 23 July 2014 on marine equipment.*

## Background

MSC 110 agreed to include in the biennial agenda of the SDC Sub-Committee for the 2026-2027 biennium and the provisional agenda for SDC 12 an output on "Development of engine control room alert management (ECRAM) performance standards", with a target completion year of 2028, assigning the SDC Sub-Committee as the coordinating organ, in association with the SSE and HTW Sub-Committees, as and when requested by the SDC Sub-Committee. In this respect, the Committee agreed that consequential amendments to the 2025 Code on Alerts and Indicators (subject to adoption by A 34) (see paragraph 11.21) should be considered at a later stage under the same output, after conclusion of the ECRAM performance standards.

**DELETED**

## Consideration at SDC 12

In SDC 12/6, Norway is proposing minor amendments to resolution MSC.302(87) with a view to applying the bridge alert management (BAM) principles in the engine control room (ECR). **DELETED**. In SDC 12/6/2, China provides comments on document SDC 12/6 (Norway) and proposes specific amendments to its Annex. **DELETED**

In addition, CLIA and IMPA, in SDC 12/6/1, are proposing that the Sub-Committee discusses and agrees on the principles and the road map that should be used in the development of the performance standards for ECRAM. The principles proposed by CLIA and IMPA, in line with those of documents MSC 110/INF.29 and SDC 12/INF.23 from Denmark, invoke the review of the human/machine interface and with more focus on HCD, human factors and how the alarms interfere with the decision-making and mental work environment of seafarers. The IEC 62682 standard "Management of alarm systems for the process industries" is presented as a valuable reference for the development of the performance standards. **DELETED**

**DELETED**

### **Agenda item 7 – Guidelines for use of fibre-reinforced plastics (FRP) within ship structures**

**Docs:** SDC 12/7, SDC 12/7/1

SDC 12/7 (Germany): provides the report of the Correspondence Group on the Revision of the Interim Guidelines for use of Fibre-Reinforced Plastic (FRP) (MSC.1/Circ.1574).

SDC 12/7/1 (CESA): contains a proposal on how to assess the fire-resisting properties of fibre-reinforced plastic elements. The goal is to introduce a test procedure for structural integrity that is suitable and valid for non-metallic materials in order to use them in maritime applications in a safe and economically efficient way and include this procedure in the revision of the Interim FRP Guidelines. It is suggested that the test procedures for load-bearing and on-load-bearing elements could be substantially simplified and in favour of a more goal-based approach, by omitting the temperature-based criterion on both the exposed and unexposed side of the specimen and by applying the failure criterion from section 4.7 of the appendix to annex 1, part 11, of the 2010 FTP Code.

*EU Relevance*

**DELETED**

*SDC 10 had considered calls by some delegations to expand the scope of the output to cover larger ships, including passenger ships. However, it was noted that although FRP are high-strength material, compared to their weight and not subject to corrosion, the high risks related to fire safety and toxic fumes endangering the health of the persons on board as well as the lack of recyclability pose challenges for the use of FRP. Therefore, the Sub-Committee agreed that the scope of the output should not be expanded, and any draft amendments to the revised Interim guidelines that would contradict current SOLAS provisions should not be developed.*

**DELETED**

### **Agenda item 8 – Experience-building phase for the reduction of underwater radiated noise from shipping**

**Docs:** SDC 12/8, SDC 12/8/1-6, SDC 12/INF.3-5, SDC 12/INF.7-8, SDC 12/INF.11-14, and 16-17

SDC 12/8 (Belgium as coordinator of the Correspondence Group): contains the report of the Correspondence Group on Underwater Radiated Noise.

SDC 12/8/1 (ASEF, ICS and BIMCO): has been submitted in support of the two-year extension of the experience-building phase of the Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life (MEPC.1/Circ.906/Rev.1).

SDC 12/8/2 (ASEF, ICS and BIMCO): refers to a recently published study that analyses long-term measurements from hydrophones installed in the deep ocean where, for the period 2003 to 2021, a

downward trend is found in low-frequency ambient sound pressure level within four of the six sites studied, i.e. representing a large proportion of the world's oceans. However, it is noted that the installed hydrophones do not cover the North Atlantic and, therefore, the trend for this significant area of shipping activity is not determined by this study. Support for further research into the causes of the observed decline in ambient sound pressure level is suggested, notably by considering carrying out similar studies at regular intervals to confirm actual levels going forward.

SDC 12/8/3 (CSC): shares the findings of a study on the potential underwater radiated noise (URN) impacts of LNG development on marine mammals in the Gulf of California. The report examines the effects of URN from LNG tanker traffic on migratory and resident whales, as well as related impacts on air quality and greenhouse gas (GHG) emissions.

SDC 12/8/4 (Japan and ICS): proposes a regional and temporal approach to URN management whereby coastal States establish protected areas based on scientific assessments. This approach considers URN's unique characteristics, varying impacts on marine species, and compatibility of measures to reduce URN with GHG reduction. This document also proposes extending the Experience-Building Phase to allow sufficient data accumulation and validation of co-beneficial technologies.

SDC 12/8/5 (Belgium): contains comments on the report of the Correspondence Group on Underwater Radiated Noise.

SDC 12/8/6 (CSC, FOEI, IFAW, Pacific Environment and WWF): provides comments on the report of the Correspondence Group on Underwater Radiated Noise, supporting the proposed establishment of a working group at this session and providing input on next steps under the proposed terms of reference for this group.

SDC 12/INF.3 (ICS, BIMCO and ASEF): reports on implementation of an energy efficiency measure on an existing ship, and the co-benefit in underwater radiated noise (URN) reduction. For an alternative scenario whereby the ship owner implements a URN management plan, the potential financial benefits of an existing incentive scheme are also assessed. It is concluded that incentive schemes have the potential to increase the uptake of the Revised URN Guidelines (MEPC.1/Circ.906/Rev.1). However, a key incentive scheme (IAPH ESI) will not incorporate URN reduction until 2027. Considering the relevance of such schemes, the present document intends to inform the Sub-Committee when considering a two-year extension of the experience building phase (EBP), enabling the impact of such incentive schemes to be better understood.

SDC 12/INF.4 (ICS, BIMCO and ASEF): includes a case study of implementation of a fleetwide Underwater Radiated Noise (URN) management plan, comparing the costs of recording underwater radiated noise, in two regions of operation, with the financial gains attributable to incentive schemes intended to reward improvements of environmental performance. Conclusion is presented of a clear financial incentive to undertake URN reduction measures. Globally, while ensuring accuracy, consistency and repeatability of URN measurements, if the availability of low-cost URN measuring technologies can be improved and the rewards from incentive schemes be sufficient to more than covering the cost of URN reduction measures, then it must surely follow that the uptake of the Revised URN Guidelines (MEPC.1/Circ.906/Rev.1) and quiet ship class notations will increase.

SDC 12/INF.5 (ICS, BIMCO and ASEF): document includes a case study on adoption of "quiet ship" class notations. The associated costs are compared with the potential financial gains

attributable to a typical incentive scheme, i.e. a scheme that is intended to improve environmental performance. It is concluded that for the example ship there is a substantial imbalance between the cost of achieving a quiet ship class notation, and the potential reduction in port dues attributable to the typical incentive scheme. Ways to address this imbalance are presented, including the reconfiguration of incentive scheme rewards, and also encouraging the development of standards for autonomous underwater radiated noise (URN) measuring facilities or equivalent technologies.

SDC 12/INF.7 (Finland): transmits a research report by VTT Technical Research Centre of Finland on underwater radiated noise (URN) in ice-class ships. The study reviews how ice-class requirements affect URN and the applicability of reduction measures, providing input to the experience-building phase under the Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life (MEPC.1/Circ.906/Rev.1).

SDC 12/INF.8 (Secretariat): informs on the outcome of the 2025 Workshop on the Relationship between Energy Efficiency and Underwater Radiated Noise from Ships to facilitate discussion on the next steps.

SDC 12/INF.11 (Germany and Netherlands (Kingdom of the)): presents the new annex on shipping noise to the OSPAR Inventory of measures to mitigate the emission and environmental impact of underwater noise.

SDC 12/INF.12 (Canada): presents the West Coast Underwater Radiated Noise from Shipping (URN) Management Plan Pilot Project led by Canada. The initiative aims to help the maritime industry apply the Revised URN Guidelines in practice by leveraging baseline URN data collected through Canada's Quiet Vessel Initiative, and by gathering lessons learned to inform the IMO URN Experience-Building Phase.

SDC 12/INF.13 (Canada): includes information on Canadian research projects supporting ongoing efforts to reduce underwater radiated noise (URN) from ships, submitted to the Correspondence Group established at SDC 11, and contributing to the experience-building phase.

SDC 12/INF.14 (Canada): provides information on the negative impacts from the use of echosounders, particularly those operating at lower frequencies, on marine mammals and the potential mitigation measures that could be implemented. Canada is seeking feedback from other Member States, particularly with respect to mitigation measures.

SDC 12/INF.16 (Japan): provides information on underwater radiated noise (URN) from commercial shipping, based on Japan's research findings and practical experience. The annexed document is based on an article published in the journal "Captain" by the Japan Captains' Association, adapted to support maritime stakeholders' understanding of URN issues and the implementation of the Revised URN Guidelines (MEPC.1/Circ.906/Rev.1).

SDC 12/INF.17 (WWF): provides new Spatio-temporal information on Arctic whale migratory routes to support the uptake of measures as per section 6 of the Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life (MEPC.1/Circ.906/Rev.1).

### EU relevance

**DELETED**

- a. *Directive 2008/56/EC, the Marine Strategy Framework Directive, sets out eleven descriptors as the basis for determining 'good environmental status', which is the Directive's main objective. The 11th descriptor in Annex I of the Directive reads: "Introduction of energy, including underwater noise, is at levels that do not adversely affect the marine environment." In addition, underwater noise is implicitly covered by overarching directives, e.g. the Habitats and Birds Directives (Council Directive 92/43/EEC and Council Directive 79/409/EEC) and the Environmental Impact Assessment Directive.*
- b. *The Marine Strategy Framework Directive defines human-induced marine underwater noise as a pollutant and requires Member States to ensure that anthropogenic noise is at levels that do not adversely affect the marine environment. The Directive further requires Member States to address the effects at an ecosystem level and ensure coordination in marine regions, leading to programmes of measures that achieve or maintain good environmental status in all EU seas.*
- c. *Commission Decision (EU) 2017/8485 sets out criteria and methodological standards to assess the extent to which good environmental status is achieved. It operationalises the descriptors of the Marine Strategy Framework Directive (MSFD). This includes criteria and methodological standards for underwater noise, including the setting of threshold values for continuous (radiated) and impulsive underwater noise.*
- d. *In respect of green shipping under the European Green Deal, the Sustainable and Smart Mobility Strategy and the Zero pollution action plan (ZPAP) sets specific actions to reduce underwater noise. In particular, the ZPAP sets the target of adopting threshold values for underwater noise by 2022. On 29 November, EU experts have adopted recommendations<sup>3</sup> on maximum acceptable levels for impulsive and continuous underwater noise. The new limits mean, that to be in tolerable status, no more than 20% of a given marine area, can be exposed to continuous underwater noise over a year. Similarly, no more than 20% of a marine habitat can be exposed to impulsive noise over a given day, and no more than 10% over a year. As to the implementation of threshold values, these stem from the implementation of Commission Decision 2017/848/EU (Good Environmental Status Decision). Therefore, Member States are expected to take these threshold values into consideration in their next update of their GES determinations when these will be notified as required by Article 17(2)(a) of the MSFD. Member States would also be expected to take measures in order to achieve those values in their marine strategies.*
- e. *The European Maritime Safety Agency, through the NAVISON project, produced ship sound maps (soundscapes) for all European seas: Baltic Sea, Black Sea, Mediterranean Sea, North Sea, and North-east Atlantic Ocean. Both hindcast maps covering the years 2016 to 2023, based on Automatic Identification System (AIS) records, and forecast maps, based on projected future shipping densities and mitigation scenarios, have been generated. Future scenarios take into account both operational and technical mitigation measures, aimed at URN and GHG reduction. The study provides milestone outputs for the years 2030, 2040, and 2050, to covering short, medium, and long-term predictions up to the end of the current IMO GHG emissions*

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<sup>3</sup> [https://environment.ec.europa.eu/news/zero-pollution-and-biodiversity-first-ever-eu-wide-limits-underwater-noise-2022-11-29\\_en](https://environment.ec.europa.eu/news/zero-pollution-and-biodiversity-first-ever-eu-wide-limits-underwater-noise-2022-11-29_en)

roadmap timeline. A key development of the project is the ability to combine individual sound map components to produce forecast scenarios for multiple combinations of mitigation measures, enabling exploration of various adoption pathways. EMSA delivered a presentation on this study during the IMO Workshop on the Relationship between Energy Efficiency and Underwater Radiated Noise from Ships (6 and 7 November 2025). To ensure continuity in the availability of URN maps for European seas, and to update the foresight analysis under the 2023 IMO Revised GHG Strategy, a new NAVISON Phase-2 project is planned to start in 2026.

## Background

SDC 9 finalised the Revised Guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life (MEPC.1/Circ.906), which was eventually approved by MEPC 80. In this regard, the Committee invited interested Member States and international organizations to submit lessons learned/best practices in the implementation of the Revised Guidelines by MEPC 85 (2026). Subsequently, SDC 10 agreed, and MEPC 82 approved, the URN planning reference chart for inclusion in the Revised Guidelines. The Sub-Committee also finalised, and MEPC 81 approved, the Action Plan for the reduction of underwater noise from commercial shipping. The Committee, in line with the recommendation of SDC 10, encouraged Member States and international organizations to take into account the outcome of the workshop on the "Relationship between energy efficiency and underwater radiated noise from ships" when considering the relationship between energy efficiency measures and URN.

Finally, SDC 10, while noting that the scope of the output was completed, agreed to a guidance document on the 3 year (with a possibility to extend by 2 years) Experience Building Phase (EBP), identifying the key areas for the EBP, and invited the Committee to encourage Member States and international organizations to follow the guidance document when gathering, preparing, and sharing experiences, data, and research during the EBP. Consequently, the Sub-Committee proposed that the title of the output is changed to "Experience Building Phase for the reduction of Underwater Radiated Noise (MEPC.1/Circ.906/Rev.1)". MEPC 82 concurred with these actions, primarily the approval of the MEPC circular on the Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life, as well as to change the output to cover an Experience Building Phase. The Committee included the new output in the provisional agenda of SDC 11 and SDC 12, for Member States, international organizations and the Secretariat to submit all technical documents concerning the EBP and other technical action items in the URN Action Plan to those two sessions of the Sub-Committee. However, the same agenda item will remain in the provisional agenda of MEPC 83-85 to accommodate potential proposals from Member States, international organizations or the SDC Sub-Committee requiring high-level direction or policy decisions. The Committee also encouraged Member States and international organizations to follow the guidance document when gathering, preparing, and sharing experiences, data, and research during the EBP.

At SDC 11 the work under this agenda item was organised in the form of a workshop providing an overview of the status of IMO URN framework, as well as information on the scope of the in-kind support to IMO, by the US and Canada, focussing on the EBP monitoring and implementation of the URN Action Plan. **DELETED** Other delegations

*expressed similar views, with some emphasising that this was a critical issue which required urgent work to assess the impact of URN on underwater life. Finally, the Sub-Committee agreed to establish the Correspondence Group on Underwater Radiated Noise, under the coordination of Belgium, in order to develop next steps to progress the URN Action Plan objectives, to develop a framework to assess the progress made on the application and uptake of the Revised URN Guidelines (MEPC.1/Circ.906/Rev.1), to select and evaluate studies on URN emissions from the maritime sector, and to draft terms of reference for a study addressing the areas where knowledge gaps had been identified in the assessment of selected studies.*

### Consideration at SDC 12

*The report of the Correspondence group on Underwater Radiated Noise, set out in SDC 12/8 (Belgium as coordinator of the Correspondence Group), describes the progress achieved as regards the development of the Experience-Building Phase (EBP) framework, the review of the technical objectives of the URN Action Plan, including the definition of next steps, the evaluation of URN emission projects and reports to identify gaps and best practices; and the drafting of the draft terms of reference for a global URN emission modelling study. **DELETED***

*One of the proposed draft terms of reference for a working group is to provide advice on a potential two-year extension of the EBP. A related document is SDC 12/8/1 (ASEF, ICS and BIMCO) which is supporting the two-year extension of the experience-building phase. **DELETED** Nevertheless, it should be clear that this extension must not result in any slowdown in the development, refinement, or implementation of the URN Action Plan, whose planned work should continue without interruption. The submission also highlights the importance of establishing sound and relevant environmental incentive schemes to help ship owners in investing in measures and technologies to reduce URN as well as the need to develop standards for, and the deployment of, autonomous buoys as an effective way to measure URN. **DELETED***

*In SDC 12/8/4, Japan and ICS point out that the impacts of URN vary significantly depending on the sea conditions in a geographical area, the density of shipping traffic, and the characteristics of the marine species subject to the URN. Therefore, the co-sponsors propose that it more appropriate to establish a regional URN management framework, focused on areas where species requiring protection are located, rather than setting global targets for total URN emissions, with a view to implement the appropriate URN measures only where they are essential to protect marine life. The co-sponsors also support the extension of the EBP in order to have enough time to collate the necessary data required to develop methodologies for assessing ship noise levels and creating noise maps, as well as for establishing URN managed areas taking into consideration the effects of URN in the different geographical areas.*

**DELETED**

**DELETED**

*It is also important to underline that submission SDC 12/8/2(ASEF, ICS and BIMCO), which presents an analysis of long-term ambient noise trends, requires careful contextualisation and, above all, a thorough explanation of its underlying assumptions and limitations. First, the projected reduction in ambient noise levels is strongly influenced by increases in sea temperature driven by climate change. This climate-related mechanism must therefore be clearly understood and explicitly taken into account when interpreting the results, particularly in relation to the link with GHG emissions. Second, the hydrophone measurements used in the study do not provide global coverage. Significant geographic gaps remain, including in regions with substantial maritime traffic. As a consequence, the dataset does not capture all relevant ocean areas nor fully represent global shipping activity. For these reasons, it cannot be concluded that the reported downward trend is representative of a large share of the world's oceans, nor that the contribution of shipping to ambient noise has been adequately assessed within the scope of the study.*

*The other two submissions SDC 12/8/2 (ASEF, ICS and BIMCO) and SDC 12/8/3 (CSC), as well as the information documents, provide information from different studies on URN measurements in different geographical areas as well as the need for further studies to collate more accurate data, which could also be considered by the working group for the further enhancement of the EBP framework.*

**DELETED**

**DELETED**

**Agenda item 9 - Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels**

**Docs:** SDC 12/9, SDC 12/9/1-6, SDC 12/INF.15, 25, and 26

SDC 12/9 (WNTI, ITF and RINA): contains a proposal for a work plan for the revision of SOLAS chapter VIII and the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)) and provides details of the rationale behind the proposal.

SDC 12/9/1 (United States): proposes the prioritization of revisions to the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)), recommends that a working group be established at SDC 12, and provides recommended terms of reference.

SDC 12/9/2 (WNTI, ITF and RINA): proposes the establishment of a correspondence group to make timely progress on the revision of SOLAS chapter VIII and the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)). It also contains a proposal for draft terms of reference for a correspondence group, based on the draft work plan in document SDC 12/9.

SDC 12/9/3 (Kingdom of the Netherlands): identifies the potential use of nuclear energy in commercial shipping and proposes a roadmap including a timeline for the revision of the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)).

SDC 12/9/4 (France): provides proposals to initiate the revision of the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)) within a dedicated framework and appropriate timeline.

SDC 12/9/5 (Russian Federation): document outlines a proposed way forward with regard to the expected revision of the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)), as agreed by MSC 110.

SDC 12/9/6 (IACS): comments on paragraph 43 of document SDC 12/9 and proposes to bring the non-safety related matters to the attention of MSC and MEPC as part of SDC 12's report, for the committees' early action.

SDC 12/INF.15 (WNTI): contains observations from analysis of the structure of the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)) and a comparative assessment of the Nuclear Code against other IMO instruments. Particular attention has been given to whether the Nuclear Code and other IMO instruments are prescriptive, or follow a goal-based approach, and whether prescriptive elements in the Nuclear Code are technology-specific.

SDC 12/INF.25 (European Commission): provides information about a study addressing the potential of nuclear power for shipping, containing *inter alia* a risk assessment.

SDC 12/INF.26 (European Commission): provides information about a study addressing the potential of wind-assisted propulsion for shipping and including a safety regulatory gap analysis and risk assessment exercises for ships using these technologies.

**DELETED**

### Background

*MSC 110 instructed the SDC Sub-Committee to:*

*.1 address all tasks listed in annex 5 of document MSC 110/WP.9, including those related to nuclear power (other gaps relate to wind propulsion, and Lithium-Ion Batteries) starting this work at SDC 12, if possible;*

*.2 consider the establishment of a correspondence group, if deemed necessary; and*

*.3 prepare a work plan for all the work related to these tasks, taking also into consideration any current work and to report back to MSC 111.*

### Consideration at SDC 12

*The submitted documents only relate to the use of nuclear power. There are no submissions related to wind propulsion or lithium-ion batteries, except information documents SDC 12/INF.26 (EC) addressing wind-assisted propulsion.*

*As regards to nuclear power, it should be noted that MSC 110 was of the opinion that the Sub-Committee should review and develop amendments to SOLAS Chapter VIII, as appropriate, regarding safety related aspects of nuclear ships, as well as to update the Code of Safety for Nuclear Merchant Ships (Resolution A.491(XII) (Nuclear Code) to account for advances in technology that have occurred since the code initially came into force, using the input provided in MSC 108/INF.21 on Gap Analysis of the Code of Safety for Nuclear Merchant Ships (WNTI). As noted above, MSC 110 instructed the Sub-Committee to consider the documents submitted and to prepare a work plan for all the work related to the tasks listed in annex 5 of document MSC 110/WP.9, taking into consideration any current work and to report back to MSC 111 as well as to consider if a correspondence group is required. **DELETED***

*The six documents submitted to this session propose the establishment of a working group at this session (SDC 12/9/1 (United States) and SDC 12/9/5 (Russian Federation)); elements to be included in the work plan (SDC 12/9 (WNTI, ITF and RINA), SDC 12/9/3 (Kingdom of the Netherlands), and SDC 12/9/4 (France)); structure of the revised Nuclear Code (SDC 12/9 (WNTI, ITF and RINA), SDC 12/9/5 (Russian Federation) and SDC 12/9/4 (France)); the establishment of a correspondence group (SDC 12/9/2 (WNTI, ITF and RINA) and SDC 12/9/5 (Russian Federation)); how to coordinate with IAEA (SDC 12/9/3 (Kingdom of the Netherlands), SDC 12/9/5 (Russian Federation), and SDC 12/9/4 (France)).*

**DELETED** *As regards to the structure and content of the revised Nuclear Code it should be noted that while SDC 12/9/4 (France) proposes a prescriptive approach, SDC 12/9 (WNTI, ITF and RINA) and SDC 12/9/5 (Russian Federation) propose a goal-based approach. MSC 110, based on the outcome of the working group, had agreed that in updating the Code of Safety for Nuclear Merchant Ships, the updates are to be technology agnostic, adopting a goal-based and/or prescriptive approach as deemed appropriate, taking into consideration the relevant IAEA standards. **DELETED***

**DELETED**

**Agenda item 10 – Unified interpretation to provisions of IMO safety, security, and environment-related conventions**

**Docs:** None

**Agenda item 11 - Review and, if necessary, amendment of SOLAS regulations II-2/13.4.1.1 and 13.4.2.1 to clarify the requirements on escape arrangements from the lower part of machinery spaces**

**Docs:** SDC 12/11, SDC 12/11/1, SDC 12/INF.19-20

SDC 12/11 (Marshall Islands, Republic of Korea, United Kingdom and IACS): provides information on the approach to approval of arrangements in accordance with SOLAS regulations II-2/13.4.1.1 and 13.4.2.1, and their safe use over more than four decades. The document proposes that, in the absence of clear evidence of safety concerns, the regulations need not be revised.

SDC 12/11/1 (Brazil, China, Indonesia, New Zealand, Oman and Hong Kong, China): includes a review of the discussions held during previous IMO meetings concerning the lower part of machinery spaces on ships. It proposes draft amendments to update and refine the regulations outlined in SOLAS regulations II-2/13.4.1.1 and 13.4.2.1, with the intention of enhancing safety standards and ensuring the effective implementation of the prescribed provisions.

SDC 12/INF.19 (IACS): supports the conclusion in document SDC 12/11 that SOLAS regulations need not be revised, this document provides the results of a comparison between evacuation times based on the calculation methodology for evacuation travel duration in the Revised Guidelines on evacuation analysis for new and existing passenger ships (MSC.1/Circ.1533). It is demonstrated that an emergency escape trunk which does not extend to the lowest deck level provides equivalent or shorter evacuation times to a safe location than an escape trunk extending to the lowest deck level.

SDC 12/INF.20 (IACS): provides further information in support of the conclusion in document SDC 12/11 that SOLAS regulations need not be revised in relation to requirements for escape from engine-rooms. It contains the report of computational fluid dynamics (CFD) simulations of fire scenarios in the engine-room of a container ship, aimed at assessing the risks associated with elevated access to emergency escape trunks and the potential benefit of lowering the access point. It

is demonstrated that there is no measurable impact of an emergency escape trunk with inclined ladder on the crew's ability to evacuate safely and swiftly during a fire.

### EU relevance

*This issue falls under Union competence.*

*Article 6(2)(a)(i) of Directive 2009/45/EC on safety rules and standards for passenger ships applies SOLAS, as amended, to Class A passenger ships. Therefore, the proposed amendments to SOLAS regulations would affect EU legal acts.*

### Background

*This issue started with long discussions at SDC 11 as regards the Unified Interpretation (UI) proposed in SDC 11/10/3 (IACS) to amend the UIs of SOLAS regulations II-2/9 and 13 (MSC.1/Circ.1511/Rev.1) in relation to regulations SOLAS II-2/13.4.1 and 13.4.2 to clarify the term "lower part" used in connection with the means of escape from spaces below the bulkhead deck.*

**DELETED** *However, several delegations were of the opinion that while there was a need to have a UI, introducing a prescribed value would go beyond the regulation which is not prescriptive. The proposed change would water down the safety elements to ensure the safe evacuation of personnel, and the Administrations should be allowed to determine the requirements taking into consideration the size and operation of the ship. Some delegations argued that some port state control (PSC) officers were taking a different view than that of Administrations and detained vessels. Therefore, such an issue should be considered by the III Sub-Committee rather than developing a UI.*

*The Chair concluded that this could be a III Sub-Committee issue as it related to the interpretation by PSC, and not the interpretation of the regulation. Therefore, rather than having the UI, the report would clarify that the Sub-Committee confirmed the interpretation that the lower part of the space should be regarded as either the lowest deck level or a platform or passageway, having noted that the majority of the delegations that intervened were of the view that the UI was not intended to be understood as "whichever is lowest" of the lowest deck level, platform or passageway. SDC 11 further invited III 11 to consider the outcome of the discussion, which raised the question of rightful flag States' interpretations of mandatory provisions being potentially challenged by PSCOs, as appropriate, regarding the need for potential guidance in the context of the harmonization of PSC activities. The concerns raised were included in the report of the Sub-Committee with a view to be discussed at MSC 110.*

*This discussion at MSC 110 was a continuation of the discussion at SDC 11. **DELETED***

*Many delegations agreed that a short-term solution must be found to cater for existing ships while a longer-term solution was required as new ships are envisaged to meet the same problem. However, there were divergent views on how to resolve the issue: amending the UI would be enough; the fact that there is a UI it is clear that the regulation is not clear; alternative arrangements have to be documented and justified; PSC officers should adhere to the interpretation of flag states; the III Sub-Committee should look into the matter; it was necessary to amend the SOLAS Regulation but could not agree with the scope of the proposed new output; and no need to have a new output if the SDC compromise is accepted.*

*After a very long discussion, as well as the organisation of an informal group, the Committee agreed with having a two-step approach (MSC 110/21 paragraph 11.27): a short-term solution by agreeing to an MSC circular inviting PSC authorities to accept arrangements approved by flag States until a permanent solution is found (MSC.1/Circ.1689 of 2 July 2025); and a long-term solution by approving a new output on the "Review and, if necessary, amendment of SOLAS regulations II-2/13.4.1.1 and 13.4.2.1 to clarify the requirements on escape arrangements from the lower part of machinery spaces", for inclusion in the biennial agenda for 2026-2027 and the provisional agenda for SDC 12, with a target completion year of 2027.*

#### Consideration at SDC 12

*As described above the delegations during IMO meetings where this issue was discussed was split. This split is further evidenced through the two submitted documents at this session. SDC 12/11 (Marshall Islands et al.) provides that there is no need to amend SOLAS regulations II-2/13.4.1.1 and 13.4.2.1 because there is no evidence that proves that there are safety concerns with these regulations. On the other hand, SDC 12/11/1 (Brazil et al.) proposes draft amendments SOLAS regulations II-2/13.4.1.1 and 13.4.2.1 in view of the differences in the interpretation of the "lower part," especially in the case of large ships.*

**DELETED**

**Agenda item 12 - Development of amendments to chapter 6 of the 2009 MODU Code regarding electrical equipment capable of operation after shutdown**

**Docs:** SDC 12/12

SDC 12/12 (China): provides comments on document SSE 10/17/2 (IACS) to the Sub-Committee and proposes further amendments to paragraph 6.5 of chapter 6 of the 2009 MODU Code, based on the amendments set out in document SSE 10/17/2.

**DELETED**

**Agenda item 13 - Development of amendments to chapter 15 of the FSS Code on enclosed spaces containing a nitrogen receiver or a buffer tank of nitrogen generator systems**

**Docs:** SDC 12/13

SDC 12/13(China): This document provides technical observations and editorial comments on the "Development of amendments to the FSS Code on enclosed spaces containing a nitrogen receiver or a buffer tank of nitrogen generator systems".

**DELETED.**

**Agenda item 14 - Revision of the Guidelines for the application of plastic pipes on ships (resolution A.753(18))**

**Docs:** SDC 12/14

SDC 12/14 (IACS): is aimed at assisting the Sub-Committee in initiating the work on this agenda item and contains proposals to amend the Guidelines for the application of plastic pipes on ships (resolution A.753(18)), with a view to aligning it with the state-of-the-art of plastic pipes and joints.

EU relevance

*This issue falls under Union exclusive competence.*

*Resolution A.753(18) is mentioned as a test standard for item MED/3.15a Materials other than steel for pipes conveying oil or fuel oil: plastic pipes and fittings, in Commission Implementing Regulation (EU) 2025/1533 of 23 July 2025 laying down rules for the application of Directive 2014/90/EU of the European Parliament and of the Council as regards design, construction and performance requirements and testing standards for marine equipment and repealing Commission Implementing Regulation (EU) 2024/1975.*

Background

*MSC considered document MSC 104/15/18 (China), proposing to revise the Guidelines for the application of plastic pipes on ships (resolution A.753(18)). Consequently, the Committee agreed to*

include in its post-biennial agenda an output on "Revision of the Guidelines for the application of plastic pipes on ships (resolution A.753(18))", with one session needed to complete the item, assigning the SSE Sub-Committee as the associated organ. However, MSC 110 agreed to include this agenda item from the post-biennial agenda of the Committee in the provisional agenda for SDC 12 as part of the continued utilization of the transfer of outputs between the SDC and SSE Sub-Committees to balance their respective workloads, as well as to take into consideration the fire safety of fibre-reinforced plastic (FRP) and safe return to port related elements in the output.

**DELETED**

#### Consideration at SDC 12

In SDC 12/14, IACS proposes draft amendments to the Guidelines for the application of plastic pipes on ships (resolution A.753(18)), with a view to aligning it with the state-of-the-art of plastic pipes and joints. **DELETED**

#### **Agenda item 15 – Biennial status report and provisional agenda for SDC 11**

Docs: None.

**DELETED**

#### **Agenda item 16 – Election of Chair and Vice-Chair for 2025**

Docs: None

**DELETED**

#### **Agenda item 17 – Any other business**

Docs: SDC 12/17, SDC 12/17/1-3, SDC 12/INF.2, SDC 12/INF.6, SDC 12/INF.9, SDC 12/INF.22, SDC 12/INF.24

SDC 12/17 (Japan): provides updated information on roll period formulae to be used during the trial use of the second generation intact stability criteria.

SDC 12/17/1 (China): contains proposed amendments to the requirements for cargo hold water level detectors in resolution MSC.277(85).

SDC 12/17/2 (China): contains a proposed amendment to the 2008 SPS Code, on the exemption of the capability requirement "shall be capable of being launched with their full complement of persons and equipment within a period of 30 minutes from the time the abandon ship signal is given" in the 2008 SPS Code under resolution MSC.266(84).

SDC 12/17/3 (Secretariat): calls for contributions by Member States and international organizations to the editorial efforts by the Secretariat prior to the publication of a consolidated version of the 2008 Intact Stability Code, inclusive of the Interim guidelines on second generation stability and associated Explanatory Notes.

SDC 12/INF.2 (IACS): informs about the publication of IACS Recommendation No.189 for determining the equivalent level of safety required by the Polar Code.

SDC 12/INF.6 (Finland): Containers are still lost at sea from ships due to excessive roll motions typically as a consequence of parametric roll resonance. The recently published Interim guidelines on the second generation intact stability (MSC.1/Circ.1627), addresses this problem. New or existing ships, even if they would pass the vulnerability check in the Interim Guidelines, may however still be vulnerable to this phenomenon in unfavourable conditions. Additional calculations that can predict these potentially dangerous conditions, and guide ships in how to avoid them are, therefore, valuable. This document shares information on a recently published research study related to a practical methodology for predicting the parametric roll resonance failure mode.

SDC 12/INF.9 (Japan): provides experience on the use of the simplified interim guidelines of the second generation intact stability criteria (MSC.1/Circ. 1627).

SDC 12/INF.24 (Denmark): presents experience gained in applying the Interim guidelines on the second-generation intact stability criteria (SGISC) (MSC.1/Circ.1627) and associated Explanatory notes (MSC.1/Circ.1652) to selected Danish vessel types. The work was conducted by a group of Danish maritime industry partners. It includes stability calculations for eight existing ships, providing insight into potential impacts of the SGISC if adopted as mandatory criteria under the IS Code.

SDC 12/INF.22 (China): reports on experience on the application of the Interim guidelines on the second-generation intact stability criteria (MSC.1/Circ.1627) to the assessment of the second-generation intact stability of a large cruise ship.