

Annex 1

SEC GEN BRIEF TO THE 48TH BGA, FAROE ISLANDS

Mr President, Deputy President, Vice Presidents and Delegates. It seems like only yesterday that we got together in Tokyo where we were hosted so excellently by the Japanese Captains' Association and I would personally wish to thank Captain Shinya Nakamura and his team for all they did to make it such a huge success. It was a memorable occasion for all who attended and for me, but this year I intend taking a rather more active role.

I am pleased to present my report to cover the period 1 November 2023 to 1 August 2025. We are now coming to the end of our second year of the IFSMA Strategic Plan "Maintaining Course and Speed" which was approved at the Tokyo BGA. My report will be linked to that so that you can see how the Strategic Plan drives what the Secretariat do on a daily basis in support of you, the Shipmasters. However, before I start, I would like to report that we announced the formal launch of the Master's Practical Guide to Maritime Law which has been a great success. In the first 6 months, it was the fastest selling publication that the International Chamber of Shipping have had, but even so I wish we had sold more. Sales have dropped off this year but even so, to date we have sold 756 copies and our share of the profits has been £36,414. The aim for the book will be that next year we will start on Edition 2 to ensure that we keep it up to date and cover any gaps from the feedback we have received. This should mean it will be ready for launch 2027 or early 2028. I will keep you informed on the progress, but if any of you have any feedback, please let Paul or me know.

January last year saw us enter our 50th year of service to our shipmasters and we had much debate as to what we should do to celebrate this milestone. In the end, it was decided that in order to save money we would keep this a very low-key celebration and that EXCO would celebrate this with a dinner at Trinity House in London, where I am an Elder Brother on the Court. This was fitting as it was the Elder Brethren of Trinity House who wrote the very first COLREGS which were adopted by the IMO. We invited our Honorary members and a few of those who have given so much of their time to support our work at the IMO and the Secretary Generals of the ICS, ITF and INTERMANAGER. Our guest of honour was the newly elected Secretary General of IMO, Mr Arsenio Dominguez, who was delighted to accept our invitation to become an Honorary Member of IFSMA and delivered a very fitting speech expressing his intention that he aimed to make seafarers and criminalisation his 2 key topics to focus on in his 4-year term. I can report that he has been true to his word.

Now moving on, I wish to remind you that in the Strategic Plan, it was agreed that as ever our mission is: "To be an independent, apolitical and financially viable organisation dedicated to representing the views and professional interests of the serving Shipmaster on the International Stage at the IMO and upholding the International Standards of Professional Competence for Seafarers." Our Vision is "to represent the Shipmaster effectively on the International Stage at the IMO and to communicate with the Member Associations so that they are more actively involved in the day-to-day dealings of IFSMA at the IMO and our Aim is "to represent in one professional body the Shipmasters of the World, to safeguard professional standards and interests in all maritime matters in order to enable shipmasters to carry out their responsible duties in an acceptable and competent manner".

The Mission, Vision and Aim drive my daily life primarily at the IMO where we are seen as one of the top 4 NGOs, along with ICS, ITF and INTERMANAGER for our delivery and output. It is worth noting that in the period from Mar 2023 – Mar 2025 we either sponsored or co-sponsored 21 papers to various IMO Committees. This is no mean feat when you consider that we have achieved this with 2 part time staff, Paul Owen and me, whilst the other 3 NGOs can call on large numbers of full-time staff. I would therefore like to thank all of the Federation Members who have volunteered to assist us in our work, particularly David Appleton of Nautilus International who has most ably represented us on the MASS Working Group and in the future the Working Group on the Comprehensive Review of STCW.

Our first key challenge is the Skills and Competence of Ships' Crews where we must learn from our membership where crews are lacking in practical skills and competence, influence STCW amendments and enable you to be more available to undertake training and mentoring responsibilities. This is an ongoing IMO output where we are involved in the Comprehensive Review of STCW. As I briefed you at the last BGA, this is an enormous piece of work and we are only just at the very beginning of this long journey. As of last month, Phase 1 of the Review has now been completed and identified 22 specific areas that need to be reviewed; and the preparation of a roadmap has been completed. We now have agreement from the IMO Council to start Phase 2 of work which covers the actual revision of the 22 highlighted areas. This is expected to begin on the 16th April next year with a 1 week special Working Group, followed by further discussion at the Human Element, Training and Watchkeeping sub-committee and another week of specialist Working Group meetings. The Council also agreed the timescale and roadmap which is a rather worrying area. At the Maritime Safety Committee there was a lot of concern about the use of Intersessional Correspondence Groups and virtual groups to complete this work. Experience had shown that the large number of CG used for the development of the MASS code meant that all the work was done by the few large delegations and the smaller, but equally important delegations did not have the resource for this type of work. In addition, too much time was wasted by poor discipline and trying to clarify and confirm the work that was being done. It was therefore agreed that Intersessional Working Groups held at IMO should, in principle, take place every year until the finalization of the Comprehensive Review, to meet the deadlines agreed in the roadmap in 2031 or 2032. As you can imagine, this has caused much debate and many including IFSMA stated that this was unacceptable as this would effectively mean that the new STCW would be out of date before it would be adopted and would undermine all the work for the review in the first place. It was agreed that IMO needs to prioritize the work within the organisation particularly with the importance of the Comprehensive Review within the industry for the safety of seafarers and delaying the timeline to 2031 will undermine the requirement for a review. Recognizing the extensive volume of work from what had been initially planned and its impact on the target completion year the IMO Council has agreed to an advanced timeline of **approval of the Review in 2029 and Adoption in later 2029 or early 2030** and in order to achieve this it will require the approval of a new project-funded technical officer post in the Subdivision for Operational Safety and Human Element (MSD) to support the work on the Comprehensive Review. When we have a full understanding of how Phase 2 is going to be conducted, I will be seeking help from the membership in taking this forward.

Our second Key Challenge is that of Criminalisation where we need to influence International Regulations to reduce the incidence of Criminalisation of the Shipmaster and encourage our

members' Shipmasters to purchase the newly issued Shipmasters' Legal Protection Insurance Scheme. It is with much regret that getting sufficient interest from our members over the last 5 years has been an uphill battle despite early interest. As we were unable to get 300 shipmasters to commit to taking on the insurance, our Underwriters at Lloyds of London withdrew their support and closed the scheme.

This has not been a good 2 years for the increasing number of criminalisation cases which have involved IFSMA's intervention and assisting others such as ITF, ICS and INTERMANAGER in trying to get fair treatment of those involved seafarers. We have managed this in a few cases, but sadly there have been a number of notable cases where this was not possible. One highly publicised case where an experienced Croatian Shipmaster and a Finnish Mate were sentenced to 30 years in jail for drug smuggling despite alerting the authorities of the possible presence of drugs after a significant amount had been found prior to departing from their port of embarkation of their cargo of coal. They were kept in jail for 11 months without charge before being brought in front of a trial which lasted approximately an hour and no mitigating evidence was provided on their behalf to prove their innocence. Their case will now go to appeal and this could take up to 18 months or more before it is heard.

This is now starting to get some interest at the IMO and the ILO where the Secretary Generals have this as their top agenda item and will get involved at the highest political levels open to them when asked for support. This year has seen the completion of the IMO/ILO Tripartite Guidelines for the Fair Treatment of Seafarers Arrested of Suspicion of Committing a Crime. IFSMA has been actively involved in its formulation over the last 2 years and you should note that the General Secretary of Nautilus International, Mr Mark Dickinson, is the Chair of the seafarer's delegation at the ILO on behalf of ITF who have been leading this work with the IMO. The Guidelines have been adopted by the ILO and the IMO's Legal Committee when the Secretary General made the following speech and I quote "unfortunately, incidents of unjust treatment of seafarers are on the rise, posing a significant challenge to the sustainability of shipping. These cases not only undermine seafarers' morale but also discourage young talent from pursuing a career at sea. In response, the Legal Committee is set to adopt the Guidelines on the fair treatment of seafarers detained in connection with alleged crimes, following their refinement and adoption by the Joint IMO-ILO Tripartite Working Group last November. I am actively working alongside the ILO, ITF, and other stakeholders, engaging with countries with established cases and the home nations of detained crew members to explore potential solutions. Your discussions and decisions this week will play a crucial role in these ongoing efforts" unquote.

As part of this ongoing campaign the IMO, ITF and ICS hosted a 1-day seminar on criminalisation and fair treatment of seafarers at the IMO immediately before the Maritime Safety Committee. It was reasonably well attended and your President flew over from Norway specially to attend. What was interesting was not who attended, but those that were noticeably absent, namely all those nations who have been involved in criminalisation cases in the last few years. The Secretary General of IMO gave an impassioned speech again for nations to treat seafarers with respect and again stated his intent to pressure Nations to do more. One of the issues that was highlighted was that some seafarers, and here I specifically mention Shipmasters, did not always receive good legal representation even when this was

being provided by their Owners or Manning Agents and were purely local national criminal lawyers with no understanding of the maritime industry. At the end of the seminar, I spoke about the lack of specialised legal support and that in many cases seafarers thought that they were covered by the company's P&I insurance, only to discover that the company had not taken the crew personal liability extension on the insurance and were therefore not covered. I also informed the audience of IFSMA's attempts to get their shipmasters legal cover up and running and the Lloyds Underwriters withdrawing this from the market due to lack of interest. Following this, I was approached by the representative from the P&I Clubs and a number of others who showed great interest in this insurance. I have since discussed this with our President, Hans Sande, who has agreed that I have another attempt to get interest from our members. Following the BGA I will write to all of our members again and seek their specific interest in taking this forward. I will also be interested if there is sufficient interest from Chief Engineers and Chief Mates. If I can get a minimum of 300 who would be prepared to take out a policy on similar terms that we offered before, I would then be prepared to discuss this further with our advising insurance broker. One point that was raised was that the cost of the policy did not include national taxation. I should point out that this is widespread national policy that not only do you often have to pay VAT on insurance policies, but also an additional national tax, usually of 20% of the annual premium.

Finally on Criminalisation, you should know that following discussions with counterpart in INTERMANAGER, we have set up a group of like-minded NGOs called the Criminalisation Task Force. INTERMANAGER has agreed to chair and administer the group and we are about to have our next meeting to look specifically at our terms of reference. We are in the process of setting up a data base to try and track the actual numbers of cases of criminalisation as often this is not reported and never comes to our attention. We will also attempt to discover if effective legal representation has been provided around the world. The main aim of the Group will be to raise awareness of each case to the group, which will then appoint a lead NGO to take this forward and what our strategy will be to put pressure on the various nations involved and to ensure they are following the new guidelines on Fair Treatment.

We do get successes on this front and a good case for this was when I was contacted by one of our members, the CEO of Anglo Eastern Ship Management. One of their cargo ships was arrested along with the crew of 23 Indian seafarers in Adana, Turkey, after drugs were found in the cable locker. I immediately discussed this with the ITF Legal Manager and the head of their Inspectorate Division. Over the next 4 days the ITF Inspector was able to ensure their fair treatment and provide advice on their rights and assist the owners legal team. I was asked by ITF to raise this with the Flag State and the Head of the Turkish Administration at the same time. The Ship was released after a new crew were brought onboard and later that same week the Shipmaster and 18 of the crew were released without charge and the four remaining seafarers were released on bail. The case is ongoing.

One issue that I wish to draw to your attention to is an issue that is raised every year by the ITF and ICS at the Legal Committee at the IMO and that the continued and increasing issue of Abandonment of seafarers. In 2024, a total number of 310 cases were reported, surpassing all the previous year's record of reported cases. In 144 of those cases, there was no obligatory financial guarantee for the seafarers involved. In all 39 national delegations and ITF spoke. There was a profound and deep concern for the alarming increase of reported cases of

abandonment of seafarers by more than 100% since 2023. The committee stated that this was unacceptable and cast a shadow over the maritime industry; there was a need for collective action and a stricter compliance mechanism. Nations were directed to come to the meeting next year with clear proposals as to how this issue is to be tackled by the Flag and Port States. I hope that they do something really positive.

Moving onto the Operation of Ships of the Future, you rightly directed that IFSMA should influence the use and development of Ships of the Future, Influence the Role of the Shipmaster, both on-board and ashore, Influence the regulation of Ships of the Future and, in particular, the development of regulation of Maritime Autonomous Surface Ships (MASS) at IMO and other International Bodies. Finally, we should influence the regulation of Standards of Competence for the Maritime Workforce of the future. This is an enormous task and as I have reported at the last 2 BGAs, IFSMA has been one of the lead NGOs on this topic for over 7 years, particularly in the development of the Code on the use of Maritime Autonomous Surface Ships or MASS for short. I have provided regular updates on this topic through my IMO meeting reports as we moved on to the development of the Code for MASS. We have been very vocal on the role of the shipmaster and the need for STCW seafarers in all aspects of MASS operations. We have been very successful in articulating the case for seafarers and have gained much national support, but it has not been an easy battle. I am very fortunate that I have had enormous support for this difficult task from David Appleton from Nautilus International. He has been actively involved throughout this work and had attended all of the Working and Correspondence Groups as time has allowed him. David thank you for all you do for us and Marcel, thank you for allowing David to do this as part of his duties for Nautilus International as his presence and knowledge allow us to lead on this topic from the front and I regularly receive complements for his knowledgeable contributions in meetings. He is here attending the BGA and has agreed to provide you with a full brief this afternoon on what we have been doing and the progress of the MASS Code as it nears finalisation later this year or early in 2026. This will include how IFSMA should influence the regulation of Standards of Competence for the Maritime Workforce of the future as this is very much part of the Comprehensive Review of STCW.

The fourth key challenge is that of Safety Management where you have directed that IFSMA promotes the removal of Shipmasters from the Watchkeeping Roster so that they are able to fulfil their responsibilities as Master, as required by International Legislation and, at the very least, influence removal of the Shipmaster from the Master/Mate 6 on, 6 off roster by the implementation of improved Deck Officer Manning Levels in ships. We must raise awareness and reduce the Administrative Burden of the Shipmaster and finally, we should bring to the attention of the shipping industry its responsibilities to meet the objectives of the ISM Code.

You will recall that on many occasions I have reported the work that we have been doing with the World Maritime University (WMU) and ITF on the issue of working hours and rest and adjustment of the recorded figures to ensure compliance. This has been a topic that we have refused to stay quiet on and we continue to find new ways to get it discussed properly. Finally, we have had some success after another survey by the WMU, sponsored by ITF and active engagement with IFSMA and some of our member shipmasters. The survey was taken across the key areas of the industry and strikingly Port State Control reported that 95% of ships inspected were compliant with the mandated hours of work and rest, but, and here is the major issue, less than 10% of seafarers reported that the records used by the ship/company were

accurate and significantly under reported their actual hours of work and rest by as much as 25%. Armed with this information we were able to persuade a group of nations to co-sponsor our paper which we sent to the Maritime Safety Committee. It is important to note that whilst UK and France declined for technical reasons, but agreed to support it verbally, Spain did indeed co-sponsor which meant that this was no longer a “Red Card” issue for discussion by the EU, thereby removing a significant hurdle in any forthcoming debate. I am pleased to report that finally our dogged persistence has paid off. Not only has the MSC agreed to carry out a comprehensive revision of the guidelines on the implementation of the ISM Code by Administrations and companies, in particular the Guidelines on the implementation of the ISM Code by Administrations and the Revised guidelines for the operational implementation of the International Safety Management (ISM) Code by Companies with a target completion year of 2028. It also stated that such work was to include incorporation of the findings promulgated in the WMU Report which confirms recurring violations, a lack of transparency, and concealments which obscure the true level of compliance of working hours and rest. This persistence of recording and reporting adjustments affects implementation and enforcement and closes down any accurate feedback mechanism to decision-makers. I will report further as this significant work is taken forward. This is timely because of the work being undertaken in the Comprehensive Review of STCW and also because this year at the ILO it was agreed that hours of work and rest in the MLC will be looked at again in 2029.

The last of your key challenges in the Strategic Plan is Public Relations and Communications. IFSMA should be seen as the International Voice for Shipmasters, encourage the sharing of information between Shipmasters, represent the professional views of the Shipmaster at the IMO and other International Bodies based on the practical and operational knowledge of our Shipmaster Members.

Since last November I have been requested to give interviews on 4 occasions for the BBC World Service in addition to the UK’s Financial Times and New York Times and most recently to the magazine “Tradewinds”, but none of them has so far been released to the public. However, it does highlight that IFSMA is still one of the “goto” organisations for the media. I will draw you attention to the IFSMA Homepage under Headline Information where you will see that since December 2023 IFSMA has been part of 5 Joint Industry Statements which includes the publishing of Management Security – Best Management Practices in March of this year. You will note that ICS and IFSMA were invited to make a statement to the IMO Assembly on the attacks on shipping in the Red Sea and Gulf of Aden and I was invited to make a statement on Criminalisation of Shipmasters to the IMO Council. These are very unusual happenings as NGOs are not permitted to speak at either the Assembly or Council meetings unless specifically agreed beforehand and only under exceptional circumstances. I think that this is a clear understanding of our standing at the IMO and IFSMA is listened to. It can be frustrating and take time, but IFSMA can and does make a difference.

Earlier this year I was delighted to host the new Norwegian Maritime Officers Association on a visit to IMO for briefings and lunch after which I was able to update them on the key challenges facing IFSMA and how these had been tackled. I also did an interview for their press officer on an article for their inhouse magazine. I have had great feedback of support from them and in the early summer I met with the press officer from the Swedish Maritime Officers Association in our office for another interview for their in-house Magazine.

Although this is just the tip of the iceberg of what I have been doing since we last met, I would like to close with one warning. It can be a dangerous place at sea around the world and it seems that it is becoming less stable with nearly 90% of the traffic that used to pass through the Suez Canal now diverting via the Cape. Traffic in the Black Sea is much reduced and the Baltic is also affected. The China Seas are being affected and care needs to be taken in the Taiwan Straits. Whilst Piracy is much reduced it still continues in the Gulf of Guinea, Gulf of Aden and Western India Ocean as well as the Straits off Singapore/Indonesia and Malaysia. You will have seen that I regularly attend the ICS Emergency Events call with other industry leaders and this is the one place where we can get the real information on what is happening in the industry and how it is affected. Oleg Grigoryuk will be giving you more detail security update as part of the presentation this afternoon.

The very last thing I have to do is to let you know that after much consideration with my family and with the agreement of EXCO I have decided to finally hang up my boots, retire to the country and become the head of maintenance and project director for the family property which we have with 3 generations of Scorers. There is much to do and after being at sea for over 30 years and ashore for 22 years, 10 of which has been with IFSMA, I think that I have served my time and need a break to be with my family. You will have seen the press release on the appointment of Captain Andrew Cook who will join us on the 1st of September and I will then work alongside him until he takes the reins in December. Thank you for all your guidance and support.

I think I have spoken enough now, but I hope this brought you up to date on the key issues. Does anyone have any questions, feel free to come and discuss any issue you might have in the break.

Annex 2

Working Environment, Health and Safety in the Maritime Industry

Presented by Morten Kviem of Norwegian Maritime Officers' Association

1. Occupational Health, Safety and Working Environment in the Maritime Industry

A research project by the National Institute of Occupational Health (STAMI), initiated by the Norwegian Maritime Officers Association (NSOF)

3. Project Objectives

- Conduct a comprehensive mapping of the maritime working environment.
- Identify how working conditions affect health, accident risk, sickness absence, and turnover.
- Generate knowledge that supports preventive efforts and strengthens the sustainability of the maritime industry.

2. Background and Rationale

• Maritime work is associated with high risk of incidents and accidents.

- Nearly two-thirds of seafarers report that mistakes can jeopardize life and health.
- Despite fewer fatal accidents in recent decades, non-fatal accidents and near misses have increased since 2016.
- Fatigue is a key safety challenge, influenced by sleep disruption, work hours, and workload.

4. Strategic Importance

- A resilient maritime workforce is crucial for Norway's green and digital transition.
- Attracting women is a strategic goal in a male-dominated sector.
- A healthy, safe and inclusive work environment is key to long-term recruitment.

5. Target Groups

- All crew categories in two maritime sectors:
- Ferry and local routes
- Offshore service vessels
- Aim to include all personnel in these areas through cooperation with employers.

7. Study Design

- Prospective cohort study over 2 years.
- Regular digital surveys (every 3 months).
- Sub-sample of 500 employees will undergo detailed measurements.

9. Example Measurements

- Sensors worn for 7 days measure:
 - Posture, activity, arm elevation, heart rate
 - Sleep and recovery
- Stationary equipment captures exposure in bridge, engine room, galley, car deck.

11. Implementation and Involvement

- **The Norwegian Maritime Officers Association (NSOF)** initiated the project and plays a key role in stakeholder mobilization.
- Employer involvement is essential to:
 - Recruit participants
 - Enable on-board access for measurements
 - Success depends on good dialogue between STAMI, NSOF and maritime companies.

13. Timeline and Funding

- Planned project start: February 2025
- Duration: 3–4 years
- Funded by:
 - STAMI (internal): 6.5 MNOK
 - NSOF (external): 7.5 MNOK
 - Total budget: ~14 MNOK

6. Key Working Environment Factors

Organizational:

Irregular hours, long shifts, inadequate staffing.

Psychosocial:

High work pressure, job insecurity, harassment, poor safety climate.

Physical:

Manual strain, noise, vibration, poor ergonomics.

Chemical:

Exposure to diesel fumes, oil mist, solvents, and cleaning agents.

8. Methods – Subjective & Objective Measures

Surveys:

- Standardized questionnaires
- Register linkage (e.g. sick leave, turnover)

Technical measurements:

- Wearable sensors (body movement, posture, intensity, sleep)
- Stationary sensors (noise, vibration, air quality)
- Exposure mapping for various vessel areas

10. Outcomes Monitored

- Fatigue and sleepiness
- Accidents and incidents
- Musculoskeletal pain
- Mild mental health problems
- Perceived accident risk and safety
- Sick leave and job turnover

12. Deliverables and Impact

- Scientific knowledge on working conditions and health in Norwegian maritime sector
- Tools to reduce accident risk and improve crew health
- Basis for better training, policies and recruitment strategies
- Anonymous unit-level reports for companies (upon request)

Annex 3

Maritime Autonomous Surface Ships (MASS) and the Master Presented by David Appleton Nautilus International (UK)

In 2017, amid the peak of hype around autonomous ships, the IMO undertook the herculean task of analysing all instruments under its remit to assess how safe, secure and environmentally sound MASS operations might be addressed in IMO instruments. This process was undertaken following a proposal submitted jointly by a consortium of Northern European countries, Japan, Republic of Korea and the United States who argued that there was a pressing need to establish a regulatory framework to allow for the full commercial utilisation of MASS and to avoid the proliferation of differing national regulatory frameworks.

For each regulatory provision under the purview of the IMO, the exercise examined whether MASS could be accommodated through equivalencies provided within existing instruments, through the development of interpretations or amendments, or by creating entirely new instruments. To facilitate this exercise, MASS were categorised into four ‘degrees of autonomy’ with the implications for each regulatory provision considered for each degree of autonomy.

Degree One: Ship with automated processes and decision support.

Degree Two: Remotely controlled ship with seafarers onboard.

Degree Three: Remotely controlled ship without seafarers onboard.

Degree Four: Fully autonomous ship.

The outcome of this Regulatory Scoping Exercise (RSE), finalised at MSC 103 in May 2021, identified several high-priority issues that must be addressed to advance a regulatory regime for MASS. Unsurprisingly, given the central role of the Shipmaster in international maritime legislation, the definition, role, and responsibilities of the Master in the context of MASS operations emerged as a fundamental theme and was identified as one of the key issues that must be resolved as a high priority in any future work.

Upon finalising the RSE, the Maritime Safety Committee agreed that the best way forward to address MASS in the regulatory framework would be to develop a goal-based MASS Code containing regulations addressing the various gaps identified by the RSE.

Development of the MASS Code.

Following numerous proposals from both Flag States and NGO’s, MSC 105 approved a roadmap for the development of an initially non-mandatory goal based instrument for MASS with completion initially anticipated in late 2024 and adoption in early 2025.

In order to facilitate this work, it was agreed to establish a Joint Working Group consisting of the Maritime Safety Committee, the Facilitation Committee and the Legal Committee to discuss the common gaps and themes that cut across the committees including the role of the ship master.

Further, it was agreed that the code should be developed on the principle that it be:

- Supplementary to any existing IMO instrument such as SOLAS and only address MASS issues insofar as they are not adequately or fully addressed in the base instrument.
- Holistic to ensure the objectives, aims and principles of the IMO base instruments are maintained whilst also ensuring that the challenges of MASS functions and operations are addressed across all instruments.
- Goal based and addressing matters at the functional level.
- Non-mandatory but developed in such a way as to facilitate future transition to mandatory status.
- Technology neutral and taking note of industry practices and experience in the deployment of new technologies.

From the outset, IFSMA and other like-minded organisations have been very disappointed with the level of discussion and approach taken by certain flag states who have driven the conversation.

A significant amount of time was spent in the early stages of development engaged in ‘crystal ball gazing’, with lengthy discussions held on various visions of the future envisaged by delegations. Whilst, undoubtedly very interesting for MASS enthusiasts, this approach failed to address many of the most fundamental questions that needed to be answered before MASS could exist within the international regulatory framework. In fact, the approach favoured by those directing the work was to avoid discussing the most difficult subjects for as long as possible, hoping that an answer would materialise at some point in the future.

The conclusion to be drawn from the way discussions unfolded, both in the development of the non-mandatory code and the RSE is that the decision to embark on this process was premature. It had been claimed or at least intimated during the proposal phase that MASS were being developed at a breakneck pace, and it was only the lack of a consistent regulatory regime that was preventing widespread adoption in international shipping. When discussions began in earnest, it became clear that delegations had widely differing understandings and interpretations of what was being discussed based almost entirely on the predicted adoption of unproven or yet to be developed technology. Whilst those who have a vested interest in automated technologies will undoubtedly defend this process as a productive and necessary step for the IMO to keep pace with technological developments, for organisations such as IFSMA, concerned primarily with seafarer safety and welfare, it could be considered unfortunate that the IMO and its member organisations have been required to dedicate an extraordinary amount of resource to the topic of MASS when there are so many other pressing issues to be resolved affecting seafarers serving on conventional vessels.

A consistent theme throughout the discussions, was that a number of participants seemed to be working on the principle that if it was foreseeable that an operator or manufacturer might propose a certain method of operation, then the regulatory regime needed to be interpreted or amended to allow for that to happen with the details of the technology that would enable the operation to be carried out safely left for a later date.

This turns the normal process for rule-making at IMO completely on its head. In normal circumstances if you wanted to propose the relaxation of standards applying to conventional vessels or introduce a new technology to carry out a task normally carried out by qualified seafarers an extensive safety case would need to be made. You would need to demonstrate that your proposed method was at least as safe as the equivalent standard and the equipment would

be required to meet rigorous performance standards. However, when discussing MASS, many delegations seemed quite content for IMO to signal that a mode of operation would be permitted, content that technology companies would come up with something to allow it to happen.

Shifting Focus

Having conducted the RSE under the assumption that it would be possible for any MASS built to be classified under one of the four ‘degrees of autonomy’, it quickly became apparent that this would not be of much practical use in the real world as vessels would operate under varying degrees of automation at various stages during any voyage or during the vessels life cycle. In other words, operators were very unlikely to be building a vessel to the standards of the IMO Code and saying ‘this is a Level 3 MASS’. In order to address this issue it was decided that the code would address the ‘functions’ of a vessel and any ship whose design or mode of operation did not conform with existing standards would be able to demonstrate compliance through adherence to the alternative provisions of the MASS code.

This has led to the adoption of a definition within the MASS code that could potentially include a very large number of conventional and/or existing vessels.

Maritime Autonomous Surface Ship (MASS) means a ship which, to a varying degree, can operate independently of human interaction.

It was also determined that the Code would only apply only to cargo ships to which SOLAS Chapter I applies, i.e. vessels over 500gt engaged on international voyages.

Discussions on the Role of the Master

As previously mentioned, the role of the Shipmaster was identified as one of the key gaps that needed to be addressed to allow for the safe operation of MASS however, there has been considerable frustration at the lack of willingness to address difficult issues head on. Whilst there are still some issues to be finalised at the final Intersessional Working Group (ISWG) which will be held this autumn, there have been a number of proposals and suggestions made around the role of the master which can be summarised by the following questions:

- Does the Master of a vessel need to be onboard?
- Does the Master need to be onboard if there are people onboard the vessel?
- Can the master be in charge of more than one vessel at any given time?

The potential implications of these discussions were cause for considerable concern for seafarer’s organisations. The decisions around definitions and applicability had had the effect of considerably limiting the number of ‘MASS’ that the Code would actually apply to at least in terms of what was being discussed as a MASS when the proposals were made. In fact, the number of true MASS (remotely or autonomously controlled vessels) in operation today that would be covered by the draft code is estimated to be zero, as the vast majority of autonomous or remote operations currently in existence involve very small craft operating in national waters.

Meanwhile, the very broad scope of applicability of the draft MASS Code as it currently stands could potentially allow for its application to a very wide range of ships that are already in existence. When considered alongside the questions that were being raised with regards to the

role of the shipmaster, then it is not hard to see how the MASS Code could have serious ramifications for the basic underlying principles that apply to the role of the shipmaster.

In the following paragraphs we will look at the questions raised in relation to the Master in some more detail.

Does the Master have to be onboard?

Article 94 of the Convention of the Law of the Sea (UNCLOS) places a clear obligation on flag states to ensure that each ship is in the charge of a master and officers who possess appropriate qualifications and that the crew is appropriate in numbers and qualification and numbers for the type, size and machinery and equipment of the ship. However, the convention is silent on where the master and crew must be located. This is because when the convention was written it would obviously have been assumed that the master and crew were present onboard. This principle was acknowledged by the IMO itself in the outcome of the RSE which stated that “All IMO instruments are provided subject to the existence of the Master on board even if there is no explicit reference.”

If a MASS is to be classed as a ship (a ship is not defined in UNCLOS), then it must operate within the framework of UNCLOS. There were a small but vocal group of Flag States who felt that this was a pivotal issue and that flag states would be unable to effectively exercise their jurisdiction and control, especially if the Remote Operations Centre is located in a different jurisdiction to the Flag State. Other potential dealbreakers were also identified including questions on how the Article 98 duty to render assistance could be met by a MASS and whether Conventions and regulations that allow a shipowner to limit their liability would be applicable to MASS.

These delegations were of the opinion that MASS could only operate legally within the international framework once amendments or clarifications had been made to the text of UNCLOS itself. This would be a highly arduous and politically challenging undertaking even if there were appetite amongst parties to pursue this route.

In the end, the strength of opposition was not enough to derail the development of the Code with the IMO deciding to press on regardless. This will not necessarily hamper the development of MASS as interpretation of UNCLOS is a matter for the parties to the convention. It is also worth noting that article 94 of UNLCOS contains a provision requiring them to conform to generally accepted international regulations, procedures and practices whilst exercising their jurisdiction over ships. Whilst IMO does not have authority to interpret UNCLOS, it has a very prominent role in determining what can be considered to be a generally accepted regulation, procedure or practice so there is a strong argument to be made that if a practice is accepted by the majority of member states of the IMO, it then becomes permissible under UNCLOS.

Whatever the strength of the respective arguments, once the decision had been made to go ahead with the development of the MASS Code, the likelihood that IMO would decide that actually, it wasn't possible to operate MASS within the international regulatory framework and therefore they were going to abandon the idea was virtually zero. The approach taken in this discussion was in keeping with others where existing conventions would inevitably be interpreted in favour of allowing MASS operations.

Does the master need to be onboard if people are onboard?

This question was perhaps the most hotly contested issue for IFSMA during the entire process of developing the MASS Code. It was clear from the outset that certain delegations were very heavily invested in a model that allowed for a skeleton crew to remain onboard whilst the command and control of the vessel was exercised from a Remote Operations Centre by a Master who would be in charge of one or more vessels. When objections were put forward, a number of impractical workarounds were suggested e.g. that there could be multiple masters in charge of different functions such as navigation, welfare of the crew, cargo etc or that it would be sufficient to have somebody qualified as Chief Officer onboard who could act as master in the event of an emergency. Significant effort was expended by those delegations in favour of this proposed mode of operation to ensure the decision went in their favour which included various tactics to keep the discussion on the agenda when it appeared that the outcome would not be in their favour.

This discussion caused significant concern for IFSMA, not only in terms of the impact on the safety of MASS but also for the precedents that would be set for existing vessels and the undermining of the basic principles that govern the role of the master.

IFSMA therefore committed a significant amount of resource to ensuring that this issue was given the prominence it deserved and made a number of interventions setting out why we believe it would be completely inappropriate at this time to allow the role of the master to be carried out from ashore at the present time.

One key aspect which seemed to have been neglected or misunderstood in the discussion was there is a difference between those obligations that rest on the master that are related to practical tasks and functions onboard and those which are related to the overriding authority and responsibility of the shipmaster. Where practical tasks and functions are routinely delegated to the officers and crew by the master, he or she will always retain responsibility and authority which cannot be delegated.

This point differentiates the discussion on the authority of the shipmaster from other aspects when considering if this task can be carried out from ashore. Whereas the assumption that certain tasks would be carried out onboard (e.g. maintaining a lookout) were in many cases largely due to the fact that there was no technologically feasible alternative, the idea that the over-riding authority rests onboard with the master is not a matter of technology but a matter of principle and, this matter of principle has been expressly stated by the IMO and reconfirmed each time that the question has been asked. This principle is stated in many provisions but most notably the ISM code and SOLAS Chapter V which sets out the principle of the Masters Overriding Authority.

Clearly, every requirement that refers to the master in existing legislation was written on the assumption that the Master is present onboard. This was also confirmed in the outcome of the RSE which stated that;

“All IMO instruments are provided subject to the existence of the master on board even if there is no explicit reference. Changing this precondition would have huge impact on the instruments. Therefore, amendment or clarification of these terms should be done carefully in a consistent manner.”

There will obviously be circumstances where the Master's presence onboard is not required to carry out a particular function or, in the case that there are no persons onboard, the requirements may no longer be relevant. However, in terms of the ISM code and the Master's overriding authority to make decisions in the interest of safety of the vessel or persons onboard, it is very clear that the assumption was that the Master would be present onboard and, if we consider the context the code was written in, in the wake of the Herald of Free Enterprise disaster, very many of the provisions would cease to make sense if you were to assume that the Master was remote from the vessel.

In other words, the principle of overriding authority residing onboard is not a matter of technology but one that has been expressly agreed upon. The reasons for that are many but include:

- The need for a clear and unambiguous hierarchy onboard with no scope for confusion as to where authority lies. This is of particular importance during an emergency situation where a person ashore may not be able to exercise authority effectively.
- The need for the person making the final decisions to have the greatest possible level of situational awareness which can only be possible onboard.
- The principle that the person making the final decisions should be the most experienced and qualified individual with knowledge of the capabilities and limitations of the particular vessel
- A moral argument that in life and death scenarios e.g. the decision whether or not to abandon ship etc, that the person making the decision should be present onboard i.e. they should have "some skin in the game".

In summary, it is fair to conclude that the principle has been established and maintained because this arrangement is the one that best ensures the safety of the persons onboard.

If the principle has been established and maintained to ensure as far as possible the safety of persons onboard, then why would it not apply to persons on a MASS. Why would a person on conventional ship continue to be subject to this principle that is aimed at ensuring effective management onboard and the best possible outcomes in an emergency scenario but a person on a ship that had been classed a MASS would not be? As MASS are currently a new and novel technology with no long term safety record, there can be no justification for applying what could be considered a lower safety standard for crew serving on MASS than would apply on a conventional vessel.

As stated previously, the principle of where the overriding authority of the shipmaster rests is not one of technology. Unlike other tasks and functions, there is no obvious system or piece of technology that would provide the obvious threshold for when the authority may be transferred ashore particularly if there are persons onboard.

It must be remembered that in developing a framework to allow for the operation of autonomous vessels, that framework cannot undermine the existing regulatory regime for conventional vessels.

When this project was embarked upon this project it was envisioned that a "MASS" would be clearly defined and would fit into a definition of a level 1/2/3/4 MASS and would be regulated accordingly. The discussion has now progressed from that scenario and it is now envisaged that the provisions of the code will apply to functions of the ship and, that one ship may operate

under different modes at different times, where provisions of the code may apply at certain times and not at others.

With this in mind, it is vital that this code explicitly states when the authority of the shipmaster may be transferred ashore as without this clarity there is very clear possibility of inconsistent application and interpretation, and scope to undermine the existing regulatory framework.

The only logical defining line that does not place limitations on the operation of uncrewed vessels is the presence of persons onboard.

It was apparent that some delegations were opposed to inserting wording on this subject on the basis that it would prohibit certain modes of operation. However it was pointed out that that the task at hand was to provide a framework that provides an equivalent level of safety. IMO has no obligation to design instruments to allow for any possible mode of operation that a company may propose. If at a future date there is a pressing need backed up by a proven safety case then the IMO would of course be free to consider those proposals at a later time.

This discussion was very hard fought but the IFSMA position was finally adopted and approved by the MSC 110 in June of this year.

Can a master be in charge of multiple vessels?

In a similar vein to the previous discussions, there was also a significant effort to ensure that the code was drafted in such a way as to allow a single master to be appointed as the master for multiple vessels at the same time. This would allow for an operating model where multiple vessels were operated from ROC with one master in charge of a 'shift' possibly supervising a number of OOW's navigating individual vessels.

This was another discussion where there was a struggle to balance the commercial interests of those proposing the operating models with what can be justified on a safety basis with the evidence currently available.

From a legal perspective, there are significant issues with the idea that a master can be in command of multiple vessels at any given time. Similar to the question of whether the master needs to be onboard, the regulation is silent on the matter but this is because the idea was never contemplated when the regulation was drafted. It is doubtful that a single master overseeing multiple vessels could be said to be in continuous command of all of them as a master who is engaged in addressing an issue on one vessel is by definition unavailable to give their full attention to what is happening on other vessels. Parallels were drawn with aviation and air traffic control where the ATC will have control of multiple aircraft any given time. However, what is being proposed here for maritime differs significantly from aviation due to the fact that each aircraft still has legal command of the vessel.

At MSC 110, the decision was made to postpone any discussion on this proposal until after the adoption of the non-mandatory code as there had not been enough time to give the matter proper consideration.

Conclusion

After eight years of deliberations dating back to the commencement of the RSE, the finalisation of the non-mandatory MASS Code is almost complete with the session of the Intersessional Working Group to be held in September/October. This session will be focussed entirely on

finalising the outstanding Human Element related issues ahead of an expected adoption of the Code at MSC 111 in May 2026.

At times during the deliberations, IFSMA and other like-minded organisations had been extremely concerned with the direction of travel and the possible implications not only for the safety of MASS but also the integrity of the existing legal framework. It seems for now that the most important arguments have been won or at least delayed to a later date. Whilst some encouragement can be drawn from the fact that many delegations appeared to see sense and abandon support for the most outlandish suggestions as deadlines for completion neared, it is also concerning how willing some delegations were to support proposals that had the potential to undermine the most basic principles that the existing regulatory framework relies on for the sake of what is still a very niche subsector of the industry.

Whilst it is unlikely that any attempts to reopen discussions on subjects in this Autumn's ISWG will be successful, IMO procedures dictate that 'nothing is agreed until everything is agreed' so we will need to be on our guard.

Following the adoption of the non-mandatory code, the IMO will move into an 'experience building phase' of unspecified duration before commencing work on a mandatory instrument. It is unclear at this time whether this will represent a pause in the work to allow for the technology and industry to mature or whether pressure from industry to press ahead will be successful. Either way, IFSMA will be ready to ensure that the best interests of Shipmasters are defended and the regulatory regime is not undermined.

Annex 4

ClassNK Autonomous Ships

Presented by Shinya Nakamura, President Japan Captains' Association.

In Japan, the commercialization of the autonomous ship is aiming at the full-scale commercial operation around 2030 with the cooperation of industry, academia and government.

The autonomous navigation systems (ANS) that the ships will be equipped with is one of the main functions of the autonomous ship.

Commercialized autonomous ships coming soon are scheduled to operate on domestic routes. In areas covered by the COLREG, autonomous ships will basically navigate without human intervention, including in congested waters.

The Japan Captains' Association believes that ships equipped with such ANS must have the same safety level as conventional ships and comply with the COLREG Convention. In other words, the autonomous ship should not cause anxiety to encountering ships.

Based on the above basic policy, the Japan Captains' Association and ClassNK conducted a large-scale verification experiment aimed at formulating standards for classification companies to objectively evaluate the safety of autonomous navigation systems, and developed evaluation area diagrams for certification.

In January 2025, ClassNK has issued the "Guidelines for Automated / Autonomous Operation on ships (Ver. 2.0)," together with annexes which outlines tier IV level safety requirements and

evaluation methods for ANS and remote operation for machinery monitoring and controlling system.

The above guidelines adopt the objective evaluation criteria proposed by the Japan Captains Association.

The presentation introduced the specific steps ClassNK will take to certify using the criteria proposed by the Japan Captains' Association.

Annex 5

Maritime Autonomous Surface Ships (MASS) in Canada

Presented by Marshall Dunbar, Company of Master Mariners Canada.

Canada has the longest coastline (243,000 km) of any country worldwide and a relatively small merchant fleet. Like many industrialized countries, it is also facing an aging workforce and is expected to have a seafarer shortage over the next 5-15 years.

This is reflected in the Seafarers Pathways Study conducted by Malatest on behalf of the Canadian Marine Careers Foundation (CMCF), which the Master Mariners of Canada MMC supports.

In this study, we see that we are facing this situation.

Current vacancy rate of 11%

Immediate need of 3,600 seafarers

An estimated need of 8,300 over the next 5 years

Of the 8,300, 55% are for "critical positions"

Training needs are not being met

One possible solution to meet the employment needs is MASS, yet it is in its infancy in Canada.

Transport Canada (TC) has followed IMO guidelines with additional requirements.

The Authorized Representative (AR) of a small MASS must prepare a risk assessment before operating.

The risk assessment shall include proposed mitigating measures to ensure the safety of navigation during the MASS operation, which provides a level of safety at least equivalent to that of a regularly crewed vessel.

The risk assessment must be made in accordance with an appropriate standard such as the MASS UK Industry Conduct Principles and Code of Practice 2021 (V5). The AR must apply to the Marine Technical Review Board (MTRB) for approval before operation. TC requirements and regulations are to be further explored.

Work on MASS is ongoing within companies and marine schools (Marine Institute, St. John's NL, in particular). The MMC presentation will explore some of these details.

Additionally, Clipper Ship, an independent USA company, has approached MMC with enquiries about their international project with a Canadian perspective. At this time we will

review the project with you, but we are reluctant to become involved as the MMC does not want to be perceived as a proponent of their project.

These scenarios create an interesting set of circumstances that show us the issues and the possibilities for MASS within Canada.

Annex 6

Revision of STCW

Presented by Sudhir Subhedar, Individual Member

Executive summary inadequate outcomes from HTW11 report Feb 2025; IFSMA needs to take a view beyond its immediate sphere of traction in STCW matters. This is the last time we can give something better to our next generation.

Reference documents

1. MSC/104/15/5, MSC 107 report, HTW6/12/3, HTW10/INF4, MSC/108/20, MSC 109 report re audits, MSC109/5, HTW11/6/1, HTW11/6/3, HTW11/7/2, HTW11/6/7, HTW11/6/2, HTW 11/6/23, HTW11/6/24, HTW11/6/26, HTW11/6/29, HTW11/6/30

Historical background

2. First STCW came into being in 1978 based on standards in vogue then in UK and the Commonwealth.

The first major revision of the Convention took place in 1995 in response to a recognised need to bring the Convention up to date and to respond to critics who pointed out the many vague phrases, such as 'to the satisfaction of the Administration', which resulted in different interpretations. STCW 1995 mainly brought in objectivity without disturbing Articles – mandate of the Convention. And, that human error is primary cause of insurance losses.

Other complaints include that the Convention is not uniformly applied and did not impose any strict obligations on Parties regarding implementation.

The next major update came 15 years after the first, with the adoption of the 2010 Manila amendments to the STCW Convention and Code. They were aimed at bringing the Convention and Code up to date with developments in the sector, and enabling them to address issues that are anticipated in the foreseeable future. However problem of non-uniform interpretation & implementation has remained in spite of Ch I Reg. I/7, communication of information and weak independent evaluation

Background

3. Measures to give full and complete effect to new look STCW that ensures higher standards of 1 competency, uniformly interpreted and implemented across the global shipping. Task of new 1 look STCW is the most important task before the Organisation. There should be “more thou shall” statements rather than should, may so as to nudge all

to comply equally. Strengthen Code 1 A & make Code B recommendations leaner. I believe ISWG and HTW11 due to paucity of time, has not been able to do justice to humungous task before the global shipping community.

Discussion

- 4 Our maritime industry is presently going through immense change. We are seeing a massive push towards decarbonisation, carbon tax and digitalisation. The systems on board are getting more complex and we are slowly moving towards potential operation of Maritime Autonomous Surface Ships (MASS). And, we are exploring options for using newer and greener fuels and at the same time trying out newer technologies to make our ships more energy efficient. Now is not the time for shying away from reduced hands on training. Now is the time to add value to hands on training by use of modern technology to practice more and add simulation exercises including use of training ships, ship handling model tanks, simulators for all levels that can safely animate fires, grounding, collisions and such other incidents in all-weather / working environment conditions.

Underlying reasons for change include but not limited to:

- Fleet renewal / green shipping is huge task – cumulative effect of new STCW should not fall on seafarer / few administrations
- A view that the 2010 revision was more of a tidying up exercise, and fell short of a comprehensive revision
- Major technological advances in information and communication technologies and digitalisation, with new equipment being introduced for shipboard operations
- Cyber security and cyber risk
- Current discussions on autonomy, levels of shipboard automation, and their impact on seafarers' education and training
- GHG emissions, decarbonisation, alternative fuels and impact on education and training
- Advances in learning technologies such simulation and virtual reality
- Duration and quality of qualifying sea service, on board training, including training of electro-technical personnel
- Quality standards at maritime education and training institutions
- The need to tackle sexual assault and sexual harassment (SASH).

There is an expectation by the shipping sector that all professional bodies related to shipping can and should contribute to the process of new look STCW.

Need for change

5. The Committee in 2021 (delayed due to pandemic) agreed for comprehensive review including re look at the Articles now more than 50 years old since first drafted. Shipping has undergone radical change and it's time to ensure clarity in phrases used or overlooked in the Articles even if it means difficult phase of Convention adoption with explicit

agreement of more than 2/3 rd majority. As a minimum, Ch. 1 of STCW regulations need to be strengthened going forward for uniform interpretation and implementation. E.g. the term certificate, party, administration, seafarer, seagoing, certificate of service, near coast voyage, simulator, national minimum education criterion, communication of information, quality, certificate recognition, continuing professional development, readiness for automation, company responsibility with respect to fitness of crew on their ships, transition provision without undue burden on cumulative effect of changes needs careful consideration.

The purpose of the STCW is to have kept the world's seas and ships safe for all, including the crew and the environment. Article 1(a) of the IMO Convention, the IMO being the organisation that enforces the STCW, clearly states the purpose: "to provide machinery for cooperation among governments in the field of governmental regulation and practices relating to technical matters of all kinds affecting shipping engaged in international trade; to encourage and facilitate the general adoption of the highest practicable standards in matters concerning maritime safety, the efficiency of navigation, and prevention and control of marine pollution from ships".

Aim

6. Aim should aim to draw on the experience and expertise of IMO members in order to improve the STCW to the highest appropriate standard and identify areas of best practice that can add value to the maritime industry alongside the Convention and Code.

STCW certification by Parties to the STCW Convention raises questions as to whether the Convention, as currently drafted, continues to meet the requirements of the industry in the 2020 – 2045 time frames.

Objectives

7. Shipping is a global industry and therefore requires a global regime for governing the competence standards and certification requirements for the approximately two million seafarers employed throughout the world merchant fleet. Uniformity and common interpretation should be the key going forward including bringing forward timely changes as technology is galloping faster than ever before.

This is because the majority of seafarers serve on ships with a flag state that is different to the country responsible for overseeing their training and issuing certificates of competence. This global regime is provided by the IMO Convention on Standards of Training, Certification and Watch keeping for Seafarers (STCW) but which has now been in place for over 40 years with less than 40 % successes.

- 7.1. Engage fraternity and stakeholders in the review process to benefit from the group wisdom and to align our outputs with expectations from review of Articles. Or strengthen Ch. I.
- 7.2. Justify benefits of clearly defined qualifying sea time, including how sea time can be made more effective. Establish the appropriate use of simulation to augment sea time. Consider remission for essential approved simulator training.

- 7.3. Demonstrate leadership in the global use of simulation for training, familiarisation and assessment 1 & recognition of certificates.
- 7.4. Align the NGO view with other like-minded organisations in order to have greater impact
- 7.5. Focus on the assessment of competency (original and revalidation / continuing professional development) as a key skill for the maritime industry both ashore and at sea
- 7.6. Identify new areas of competency to be included in STCW, such as IT and fuel handling
- 7.7. Identify areas that should be removed from the existing Convention and Code
- 7.8. Identify improvements for ship-handling training
- 7.9. Identify where 'best practice' guides are more effective than STCW regulations and what role the NGO should have in producing them
- 7.10. Ensure that DP Certification remains a high (rather than minimum) standard
- 7.11. Consider how specialised skills such as tug handling and offshore energy operations should be recognised
- 7.12. Ensure that focus on Human Factors is maintained.
- 7.13. Arrest incidents of bullying and harassment on board ships, including sexual harassment, which have been brought to the attention of the IMO at MSC 105.
- 7.14. Re-examine Ch. IV radio communication and Ch. VII Alternative certification.

Conclusion

8. Several maritime accident reports have pointed towards inappropriate watch keeping practices leading to casualties, and there have also been concerns raised in the quality of on-board training for seafarers who are in the process of obtaining their first certificate of competency. For cadets, it has been difficult to complete the required seagoing service due to non-availability of seagoing berths. On the other hand, there is no evidence that undefined simulator training is better than hands on experience on sea going ship. Revalidation of certificates during the pandemic has also been a challenge for both seafarers and shipping companies, despite many countries taking pragmatic approaches towards this; such as continuing professional development. This becomes very important in the context of impending autonomous ships which will surely be around before another STCW revision that will come up before 2047.

9 IFMA paper to ISWG2 / HTW12 before November 2025.

Annex 7

STCW Amendments & Korea's Maritime Officer Training System Presented by Gwee-bok LEE, Korean Ship Masters' Association

Introduction to the Republic of Korea's Maritime Officer Training and Retraining System in Connection with the STCW Amendments: An Overview

1. Introduction

The safety and efficiency of the shipping industry are pivotal to global maritime transport. The International Maritime Organization's (IMO) International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) plays a critical role in standardizing the professional competency and safety management of seafarers. Since its major revision in 1995—and further refined by the 2010 Manila Amendments—the STCW has significantly strengthened the requirements for education, seagoing service record-keeping, issuance, and renewal of certificates. In response, the Republic of Korea has overhauled its domestic laws, including the Ship Officers Act, the Seamen Act, the Radio Act, the Marine Accident Inquiry Act, and the Education Act, to transform its seafarer training and refresher systems in line with international standards.

2. Overview of STCW Amendments and Key Provisions

Background for the Amendments: Originally adopted in 1978, the STCW was overhauled in 1995 to address evolving maritime conditions, followed by further amendments in 2010. Major Enhancements:

- Introduction of systematic training and evaluation criteria.
- Emphasis on documenting seagoing service through standardized training record books.
- Establishment of a robust system for certificate renewal and remedial training.
- Adoption of modern technologies such as GMDSS and simulator-based training.

3. The Republic of Korea's Seafarer Training System

Structure: The training pathway progresses from basic education (elementary to high school) to specialized maritime education (via four-year universities, technical colleges, and maritime high schools), followed by cadet programs and onboard training (including bridge watchkeeping, engineering, and radio operations), culminating in a national examination and certificate issuance.

Key Institutions:

- Korea Maritime University: A leader in merchant shipping education, employing advanced simulators, training ships, and international exchange programs.
- Mokpo National Maritime University: Renowned for its practical, hands-on training in navigation and engineering, ensuring graduates are job-ready.
- Korea Maritime and Fisheries Training Institute: A government-run institution responsible for seafarer certificate acquisition, remedial training, and computerized management of training data.
- Maritime and Technical High Schools: Provide foundational seafarer education and practical training that prepare students for further maritime careers.

4. Certification, Examinations, and Refresher Training

Certification System: Seafarer certificates (ranging from Grade 1 to Grade 6) and radio communication licenses (both electronic and telegraphic) are issued upon completion of required seagoing service, training, and passing national examinations (written, oral, and practical). Refresher Training and Renewal: Certificates are valid for five years. Renewal

requires the completion of remedial courses in subjects such as radar operations, GMDSS, and first aid, as well as verification through training record books and health examinations.

5. Quality Evaluation and Policy Integration

Quality Management: Designated training institutions, exam bodies, and certification authorities are subject to regular (every five years) and ad hoc evaluations to continuously improve the quality of education and training. Linkages with the 2nd Seafarer Policy (2024–2028): The national policy aims to ensure a stable supply of seafarers, improve working conditions, and cultivate globally competitive future seafarers. Key measures include encouraging the employment of Korean seafarers, rationalizing the management of foreign seafarers, implementing short-term job-linked training programs, and introducing long-term seafaring incentives.

6. Conclusion

The Republic of Korea has proactively integrated the objectives of the STCW revisions by establishing a comprehensive system for seafarer training, refresher courses, seagoing service management, and certificate issuance. This robust system not only meets international maritime safety standards but also enhances Korea's global competitiveness. Sustained innovation and close collaboration among the government, industry, and labour will be essential to drive further improvements.

Annex 8

Maritime Career Paths 2024

Presented by Hans Sande, Norwegian Maritime Officers Association & IFSMA President

Based on a study carried out by Menon Economics on behalf of the Norwegian Maritime Officers Association (NSOF)

This document has been translated from Norwegian to English using AI.

The report provides a comprehensive analysis of career development, recruitment, and labour market dynamics within the Norwegian maritime sector. It builds on previous reports from 2019 and 2021 and is based on new, extensive data collected in 2024 through surveys of over 5,000 current and former seafarers, as well as 80 maritime companies. The objective has been to map career paths both at sea and onshore, assess the sector's capacity to recruit and retain qualified personnel, and identify trends and challenges that may affect the long-term sustainability of Norway's maritime workforce.

A central finding of the report is that approximately half of the seafarers currently working at sea expect to remain there for the rest of their careers. The other half foresee a transition to onshore work, with 45 percent expecting to make this shift within the next 10 years. If these intentions are representative of the wider maritime population, this could mean that around 9,000 of the roughly 20,000 active Norwegian seafarers may go ashore by 2034. This projection raises important questions about recruitment, succession, and long-term access to maritime expertise at sea.

Those who leave sea-based roles often move into positions in the maritime industry on land. Many are employed in shipping companies, in management or operations roles, while others join maritime service providers – such as firms specializing in technology, design, classification, and insurance. A smaller portion take up roles in the higher education and research sector. The decision to move ashore is driven by a range of factors, with the most commonly cited motivations being better job opportunities on land, family-related considerations, salary expectations, and dissatisfaction with onboard conditions, such as work environment and perceived lack of support.

Despite these outflows, the report notes a positive trend in recruitment. In 2024, Norway recorded a historic high in applications to maritime education programs, particularly at the vocational and college levels. This suggests that recent recruitment efforts and outreach initiatives may be having a tangible effect. However, the report also reveals a mismatch between the expectations of students and the understanding many companies have of these expectations. About 46 percent of companies report having limited insight into what young people look for in a maritime career. Focus group interviews with students highlight key priorities such as inclusive working environments, adequate training, clarity around health and safety (HSE), and facilities that support a healthy work-life balance. While access to the internet is not seen as a privilege, it is broadly expected to function reliably.

When asked about their preferred segments within the maritime industry, younger seafarers often highlight offshore and aquaculture due to attractive salary conditions and perceived opportunities. Others are drawn to international shipping or coastal transport, including ferries and express boats. Students' career choices are shaped by a variety of factors, including family traditions, curiosity, lifestyle considerations, and the multicultural nature of maritime work.

From the perspective of employers, the future need for experienced personnel is clear. Four out of ten companies anticipate a growing need for seafarers with operational experience in shore-based roles over the next five years. A similar share report that they expect increased demand for crew at sea. At the same time, companies increasingly struggle to find candidates with the right qualifications and experience, suggesting that access to relevant competence is becoming a bottleneck for the industry.

The report concludes that while Norway's maritime sector retains a strong position, there is a pressing need to better align career development, recruitment strategies, and workplace policies with the realities of a changing labour market. Ensuring that more seafarers choose to stay longer at sea will require attractive conditions throughout different life phases, competitive compensation, and predictable, family-friendly sailing schedules. Strengthening the connection between education and the industry is equally important – both to support young entrants and to ensure long-term knowledge transfer.

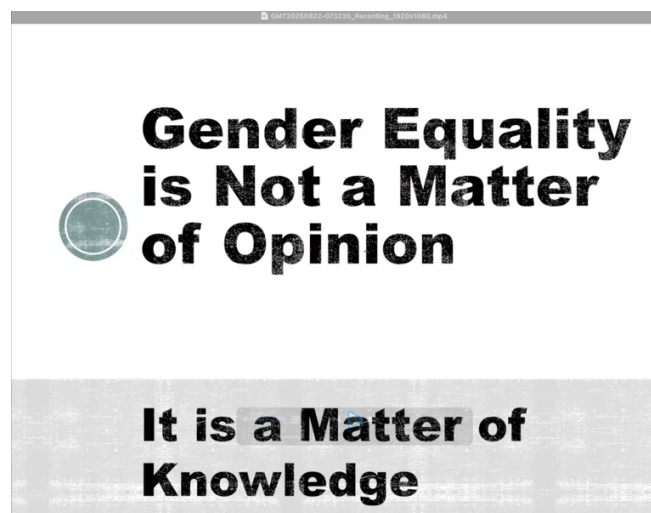
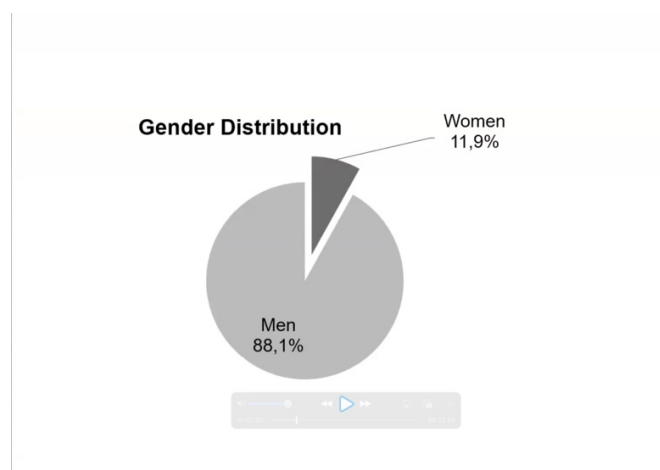
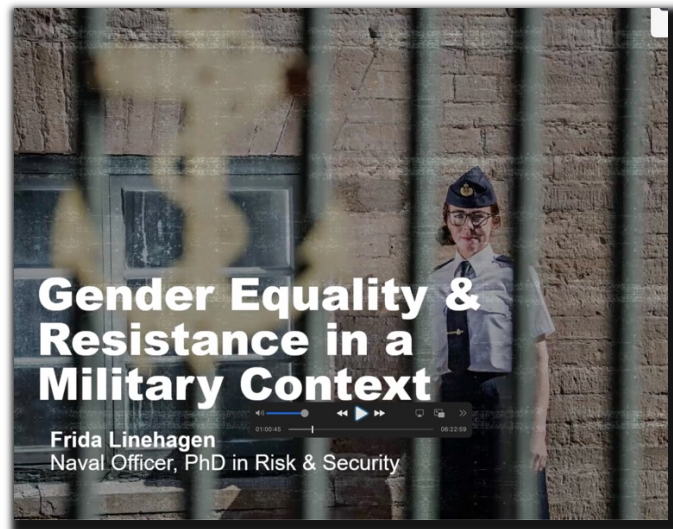
The report's findings are intended to provide a solid evidence base for policy development, industry dialogue, and targeted initiatives to secure the future of Norwegian maritime competence, both at sea and onshore.

Annex 9

Gender Equality & Resistance in a Military Context

Frida Linehagen, Naval Officer, Swedish Navy, PhD in Risk & Security

Sample of 3 of the slides presented



Annex 10

Baltic Shadow Fleet, Hybrid Maritime Threat Analysis Presented by Martin Björkell, Finnish Ship's Officers Union

Several written papers submitted, only one reproduced here:

[The Eagle S Incident: Investigative Summary and Strategic Implications](#)

Prepared by: Martin Björkell

Date: June 2025

[Executive Summary](#)

On 25 December 2024, the oil tanker Eagle S, flagged under the Cook Islands and operating as part of a Russia-linked “shadow fleet,” allegedly severed the Estlink 2 submarine power and data cable while transiting the Gulf of Finland. Finnish authorities boarded the vessel, which was missing its port anchor and showed signs of serious maritime deficiencies. The incident triggered a criminal investigation under suspicion of aggravated sabotage, as well as diplomatic and security concerns across the Baltic region¹.

[1. Vessel Overview](#)

- Name: Eagle S
- Previous Names: FR8 Pride, LR Mimosa, Norstar Intrepid
- Flag: Cook Islands
- Year Built: 2006 (China)
- Owner: Caravella LLC (UAE)
- Affiliations: Cited as part of Russia’s “shadow fleet” used to evade oil sanctions³.
- Deficiencies: Over 30 safety and operational deficiencies were reported, including the absence of valid maritime insurance and missing anchoring gear³.

[2. Incident Timeline](#)

Date	Event
25 Dec 2024	Eagle S crosses the Estlink 2 route; power/data cables severed ¹ .
26 Dec 2024	Finnish Border Guard boards vessel; anchor found missing ¹ .
30 Dec 2024	Investigators find anchor drag marks extending dozens of kilometers ¹ .
3 Jan 2025	Helsinki court upholds vessel seizure ⁶ .
7 Jan 2025	Swedish Navy recovers missing anchor and hands it to Finnish officials ² .
8 Jan 2025	Vessel declared unseaworthy; 32 deficiencies logged ³ .
2 Mar 2025	Eagle S released; crew barred from EU. Investigation remains open ⁴ .

[3. Technical Findings](#)

Cable Damage: Estlink 2, a critical 650 MW subsea power cable between Finland and Estonia, was physically severed during the vessel's passage¹. Several telecommunications cables were also affected.

Anchor Drag Marks: Seabed surveys identified anchor scars spanning over 80 km, consistent with a large tanker dragging equipment¹.

Recovered Anchor: On 7 January, the missing anchor was recovered near the damaged cable zone and matched to Eagle S².

4. Espionage and Security Allegations

While no espionage charges have been filed, Lloyd's List reported that Eagle S may have been carrying unauthorized communication devices and individuals suspected of monitoring NATO communications⁷. Finnish authorities have neither confirmed nor denied these reports.

5. Legal and Political Context

- Criminal Charges:
- Aggravated sabotage
- Telecommunications disturbance
- Vandalism of critical infrastructure¹

Customs and Sanctions:

The tanker's 35,000-ton gasoline cargo was seized on suspicion of sanctions violations. Finnish Customs ultimately opted not to pursue sanctions-related charges due to insufficient evidence⁵.

Geopolitical Reaction:

NATO launched Operation Baltic Sentry to monitor Baltic Sea infrastructure. The EU has identified the incident as a possible hybrid threat and emphasized the need for enhanced surveillance of undersea assets⁸.

6. Strategic Implications

Infrastructure Vulnerability:

The case revealed alarming vulnerabilities in submarine cable systems vital to European energy and communications, underscoring the lack of adequate monitoring mechanisms for such critical infrastructure⁸.

Risks from the Shadow Fleet:

The Eagle S is emblematic of a broader challenge posed by the "shadow fleet"—older vessels operated through opaque ownership structures to transport Russian oil despite Western sanctions³. Their degraded condition and lack of compliance create both environmental and geopolitical risks.

Conclusion

The Eagle S incident highlights the convergence of maritime safety, hybrid threats, and sanction evasion in Northern Europe's contested waters. Though the incident may have been accidental, Finnish authorities continue to treat it as a potential act of sabotage. The case has galvanized regional cooperation on maritime surveillance and raised the bar for regulatory scrutiny of shadow fleet operations.

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Other paper available upon request to IFSMA HQ:

1. Dark Waters: Hybrid Maritime Threats and the Russian Shadow Fleet in the Baltic Sea.
2. Operation Baltic Sentry: Maritime Hybrid Threat Enforcement Case Study
3. Baltic Sea GNSS & AIS Disruptions: Merchant Navy Risks, Responses, and Regional Trends
4. Baltic Sea Shadow Fleet Incident Trend Report (Q2 2025)
5. NewNew Polar Bear Incident: Investigative Summary and Strategic Implications

Annex 11

Ukraine, Geo-Political Problems, Global Threats

Presented by Oleg Grygoriuk, Marine Transport Workers' Trade Union of Ukraine

Subjects covered are included in the IFSMA Open Letter reproduced here:

An Open Oetter to All Governments, International Organizations and the Maritime Industry

A call from Shipmasters

Global Threats, Trends and Risks to Shipping and its Seafarers

The International Federation of Shipmasters' Associations (IFSMA) [see: www.ifsma.org] was established in 1974 to uphold International Standards of Professional Competence for Shipmasters and Seafarers. It is a federation with a policy to ensure Safe Operational Practices, Preservation from Human Injury, Protection of the Marine Environment and Safety of Life and Property at Sea.

In 1975, IFSMA was granted Consultative Status as a non-governmental, apolitical organisation at the International Maritime Organization (IMO) which enables it to represent the views and protect the interests of the world's serving Shipmasters unfettered and unfiltered by others.

Geopolitical Instability and Its Impact on Shipping

The current geopolitical climate is marked by heightened regional conflicts and tensions in critical maritime areas. Conflicts in the Middle East, Ukraine, and other regions have led to a surge in attacks on merchant vessels by State and non-State actors using conventional and hybrid means. This has led to the closure or restriction of strategic sea lanes, such as the Red Sea and the Strait of Hormuz, causing severe disruptions to global logistics, rerouting of maritime traffic, and increased operational risks. While seafarers play an essential role in supporting global trade, they are increasingly being used as pawns within these conflicts.

Resurgence of Piracy and Threats from Non-State Actors

After years of decline, piracy has re-emerged as a serious threat. In 2024, vessel hijackings were again reported off the coast of Somalia. Simultaneously, terrorist and politically motivated groups are increasingly using advanced technologies, including UAVs and naval mines, making the maritime domain ever more unpredictable and dangerous.

Economic Protectionism and Sanctions

Rising protectionism, along with unilateral sanctions and trade restrictions, has resulted in the reconfiguration of global trade routes and maritime uncertainty, increasing pressure on shipmasters navigating restricted or sensitive regions with higher risks of vessel arrests and crew detentions on allegations of sanction violations, often without due legal process or sufficient evidence.

Criminalisation of Shipmasters and Crew

There is a growing trend of criminalising the actions of shipmasters and senior officers in connection with sanctioned regimes or incidents beyond their control. This has led to a rise in vessel arrests and subsequent detentions of crew and their criminal prosecution, including holding masters criminally liable for issues such as smuggling or cargo violations of which they had no knowledge. This often leads to extended detentions without trial or a charge clearly violating international legal standards and the recently agreed IMO/ILO guidelines on fair treatment of seafarers suspected of committing a crime. Measures to fight against criminalisation are often debated, but very little is seen to make any impact.

Violation of Labour Rights and Mounting Pressure on Shipmasters

It has been noted that shipmasters are increasingly working under high levels of stress, facing threats of detention, prosecution, and financial penalties. They are often subject to undue pressure from port authorities, shipping and management companies, charterers and other stakeholders. These conditions severely impact decision-making and crew welfare endangering maritime safety.

Concern at IFSMA

IFSMA expresses serious concern about the escalating geopolitical tensions, increasing threats to global maritime security, and the disturbing trend of the criminalisation of maritime professionals and violations of their fundamental rights. Shipmasters are on the frontline of these challenges, often required to make rapid decisions in high-risk and pressured environments that endanger not only their vessels and cargo, but also the lives of their crews. Seafarers play an essential role in supporting global trade, but they are increasingly being used as pawns within these conflicts. The COVID-19 pandemic clearly demonstrated that seafarers constitute a vital link in the global supply chain. In recognition of this fact, the IMO and ILO have formally designated seafarers as ‘key workers’.

Call to Governments and International Organizations

IFSMA therefore very strongly urges all Governments and International Organizations to ensure the protection of shipmasters and crews from arbitrary detention and criminalisation, commit to upholding human rights in maritime operations and establish transparent legal frameworks for port detentions and sanctions enforcement and in particular the IMO/ILO guidelines on fair treatment of seafarers suspected of committing a crime.

Call to Shipping Management Companies

IFSMA very strongly urges Shipping and Management Companies to provide training on sanctions-related risks and ensure legal assistance and institutional support to masters and seafarers suspected of committing a crime in accordance with the IMO/ILO guidelines on fair treatment of seafarers suspected of committing a crime.

Call to all maritime stakeholders

IFSMA very strongly urges all maritime stakeholders to promote information-sharing on high-risk areas and support international initiatives to end the criminalisation of maritime professions.

IFSMA remains committed to safeguarding the rights and safety of shipmasters and will continue to engage with key stakeholders across global shipping - including Governments, Intergovernmental and non-Governmental Organizations, National Authorities and Industry Partners to promote fair, safe, and just working conditions for maritime professionals.

Issued by IFSMA

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Annex 12a, 12b and 13, see main report

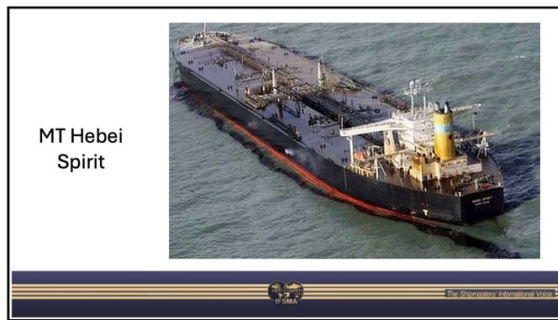
Annex 14

Hebie Spirit Incident

Presented by Andrew Cook, IFSMA Secretary General Designate



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3



4

END.