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Circular Letter No.5057
1 September 2025

To: All IMO Member States

Subject: IMO Member State Audit Scheme – Consolidated Audit Summary Report (CASR)

1 The Secretary-General has the honour to transmit herewith the eighth consolidated audit summary report (CASR) prepared in accordance with paragraph 7.4.3 of the Procedures for the IMO Member State Audit (resolution A.1067(28)), containing lessons learned from 11 audits, three audits completed in 2022, seven audits completed in 2023 and one audit completed in 2024.

2 The CASR, which is intended to facilitate the attainment of three of the objectives of the Scheme as contained in paragraphs 5.2.1, 5.2.3 and 5.2.4 of the Framework for the IMO Member State Audit (part I of the annex to resolution A.1067(28)), has been developed to reflect the findings and observations issued during audits, as well as corresponding summaries of root causes identified by each audited State and summaries of corrective actions taken or proposed by each State, which provide valuable lessons for Member States. The CASR also contains best practices revealed in audits, in order to share them with Member States, with a view to assisting them to enhance further their implementation and enforcement of the mandatory IMO instruments.

3 In order to enable the Organization to further consider the effectiveness and appropriateness of its legislation and to facilitate the provision of technical assistance to Member States in those areas identified in audits, future CASRs will continue to be issued as circular letters as and when the reporting from a reasonable number of audits has been completed. A reference to each circular letter issued will be included in the document reporting to the Council and Assembly on progress made in the implementation of the Scheme.

ANNEX

EIGHTH CONSOLIDATED AUDIT SUMMARY REPORT

INTRODUCTION

1 In fulfilling the objectives as stipulated in paragraph 5.2.3 of the *Framework for the IMO Member State Audit* (resolution A.1067(28), annex, part I) and as required by paragraph 7.4.3 of the *Procedures for the IMO Member State Audit* (resolution A.1067(28), annex, part II), this document is the eighth Consolidated Audit Summary Report (CASR) containing lessons learned from 11 mandatory audits, three audits completed in 2022, seven audits completed in 2023 and one audit completed in 2024

2 The report reflects the five categories of General (findings and/or observations relating to strategy, organization and legal system, with the latter dealing mainly with the incorporation of the mandatory IMO instruments into national law), flag State activities, coastal State activities, port State activities and best practices, respectively, from the previously issued 11 audit final reports.

3 This report contains the findings and observations identified during the audits, which were conducted using the *IMO Instruments Implementation (III) Code* (resolution A.1070(28)) as the audit standard, with each finding and/or observation followed by the summary of root cause identified by the audited State and summary of the corrective action taken or proposed by the State.

4 The outcome from audits provides valuable lessons on the implementation and enforcement of the mandatory IMO instruments covered by the Scheme. They also identify areas where States, in exercising their rights, meeting their obligations, and discharging their responsibilities attendant to the applicable mandatory IMO instruments, have either fallen short in some areas or have encountered some difficulties in doing so. Best practices reflect the strengths and, in some cases, novel ideas employed by States to effectively meet their obligations and responsibilities.

5 In an effort to disseminate the lessons learned from audits, with a view to assisting Member States to enhance further their implementation and enforcement of the mandatory IMO instruments and to inform the associated work of the relevant IMO bodies, future CASRs will continue to be issued as circular letters.

GENERAL

Findings (FD)

6 The existing legislative process for the transposition of amendments to IMO mandatory instruments into national legislation did not ensure that such amendments were incorporated into national legislation prior to their entry into force internationally for the purpose of providing an adequate legal basis for effective implementation and enforcement. In addition, the primary national legislation implementing matters regulated under MARPOL did not refer to MARPOL, but to an instrument that had been superseded by MARPOL (OILPOL 1954) (MARPOL, article 1; III Code, paragraph 8.1; III Code, paragraph 8.2).

Root cause

7 The following factors contributed to this finding:

- .1 complex and delayed legislative process and lack of coordination between the different entities involved in processing amendments; and
- .2 there was a lack of knowledge regarding the need to update the national regulations regarding MARPOL, and responsibility, supervision, and analysis of the updating of primary national legislation regarding MARPOL had not been assigned.

Corrective action

8 The State will implement the following actions:

- .1 there will be a formal communication from the Maritime Authority (MA) to the "Coordination Committee of the National Maritime Administration" and to State's entities involved in the implementation and enforcement of mandatory IMO instruments, on the findings and observations resulting from the audit;
- .2 a review will be carried out by the MA, of the directive, which "establishes administrative procedures and provides instructions for the adoption and implementation of mandatory IMO instruments and assigns responsibilities for the use and control of the Global Integrated Maritime Information System of IMO (GISIS)"; aiming to identify possible improvements, to reduce amendments' analysis time and preparation of technical reports;
- .3 a technical review board will be established, composed of the involved entities to analyse the obstacles in the process of processing and adopting amendments to the mandatory IMO instruments; and to propose a work plan aiming to implement measures to reduce amendments' processing time;
- .4 the MA, through its respective department, will carry out a review of the computer application "Instrument Control and Processing System", to make its operation more efficient and effective;
- .5 the MA will carry out an analysis and assessment of current outdated legislation regulating MARPOL, to identify, draft and promulgate, in the national legislation, new legislation to give full and complete effect to MARPOL;
- .6 after the corrective action proposed in .5 is done, it will be proposed to the Ministries with jurisdiction in the matter, the formation of a national working group in charge of endorsing the proposals for updates suggested by the MA and in this context initiating the legislative processes for further adoption; and
- .7 once the directive on "administrative procedures and instructions for the adoption and implementation of mandatory IMO instruments and responsibilities for the use and control of GISIS" is reviewed, in-house training will be developed and conducted to raise awareness and knowledge of the relevant personnel.

This corrective action will be completed by 31 December 2025.

FD

9 No independent evaluation in accordance with the requirements of STCW 1978 had been carried out and communicated to IMO (STCW 1978, regulation I/8.3; III Code, paragraph 9).

Root cause

10 There was a lack of knowledge regarding the obligation to carry out an independent evaluation in accordance with the requirements of the STCW 1978, regulation I/8.3 and communicate the report to IMO within the five-year required time frame.

Corrective action

11 The State will implement the following actions:

- .1 coordinate and carry out the independent evaluation in accordance with the requirements of the STCW 1978 and, subsequently, communicate it to IMO;
- .2 develop and implement an administrative procedure for the preparation and execution of the independent evaluation according to STCW 1978 requirements and related IMO guidelines. This procedure will be integrated into the quality management system (QMS) of the Administration; and
- .3 in-house training will be delivered to raise awareness and knowledge concerning STCW 1978 matters, and the training will be periodically reviewed.

This corrective action will be completed by 31 July 2025.

FD

12 Although there was a system for the transposition of amendments to the mandatory IMO instruments into national legislation at the Federal States level, some of the amendments had not been transposed into national legislation before they came into force to ensure the effective implementation and enforcement of requirements stemming from the mandatory IMO instruments (III Code, paragraph 8.1).

Root cause

13 The regulation on the transport of dangerous goods in one of the ports of the State had not been reviewed in order to incorporate the more recent amendments to the IMDG Code, the IBC Code and IMSBC Code due to a lack of resources.

Corrective action

14 The State will review and update The "Port Dangerous Goods Regulation" to incorporate the latest amendments to the applicable mandatory codes and introduce sliding referrals to the reference norms to avoid future revisions to deal with the lack of resources. This corrective action will be completed by 1 March 2025.

FD

15 The transposition of amendments to SOLAS 1974 had not been carried out in a timely manner by the State. Specifically, amendments to chapters II-1 and IV of SOLAS 1974 that came into force 2020 had not been transposed into national law (SOLAS 1974, article I; III Code, paragraph 8.1).

Root cause

16 Inadequate resourcing dedicated to updating State's maritime legislation and poor record keeping of upcoming and outstanding amendments to the mandatory IMO instruments created a backlog of required changes to State's maritime legislation.

Corrective action

17 The State will implement the following actions:

- .1 will introduce omnibus international amendment rules that will align the maritime legislation with the latest international standards, including the amendments identified in this finding;
- .2 a new regulatory policy team had been created, which will contribute to better resourcing the process of transposing amendments to the mandatory IMO instruments into national maritime legislation; and
- .3 will also implement procedures and seek to develop a digital platform that will identify all current and future international obligations in advance by the international engagement team and ensure that these are registered with the regulatory policy teams. These procedures will include active tracking, monitoring and recording of decisions on both mandatory and non-mandatory outputs to enable appropriate transparency, discoverability and visibility of actions taken against all IMO outputs.

This corrective action will be completed by 31 December 2025.

FD

18 The State has not fulfilled some of the obligations regarding communication of information to IMO under the mandatory IMO instruments (SOLAS 1974, article III; STCW 1978, article IV; III Code, paragraph 9).

Root cause

19 Lapses in the processes in the maritime administration and a lack of clear allocations of responsibility has resulted in some specific reporting obligations to the IMO not being implemented.

Corrective action

20 The State will implement the following actions:

- .1 the maritime administration will design and implement processes and systems that will identify all current international reporting obligations under the mandatory IMO instruments, as well as anticipate future reporting

obligations, and integrate them as part of our regular IMO reporting process in a consistent and timely manner; and

- .2 responsibilities for ensuring that reporting obligations to IMO are fulfilled will be assigned and there will be procedures to actively track, monitor and record such reporting to ensure that the reporting obligations are met.

This corrective action will be completed by 31 December 2025.

FD

21 There was no objective evidence to demonstrate that the State complied with all the requirements of the mandatory IMO instruments relating to communication of information to IMO (SOLAS 1974, article III; MARPOL, article 11(1)(a); STCW 1978, article IV; STCW 1978, article VIII; STCW 1978, regulation I/8.3; TONNAGE 1969, article 15; LL 1966, article 26; III Code, paragraph 9).

Root cause

22 The State acknowledges an insufficient overarching system to ensure required reporting is carried out.

Corrective action

23 The State will establish a system that ensures reporting is carried out. The Administration will coordinate that existing and future obligations that pertain to the State's communication of mandatory information to IMO are acknowledged and followed up in order to ensure compliance by the different entities of the State. This corrective action will be completed by 1 July 2027.

FD

24 The transposition of the mandatory IMO instruments into national legislation had not always been carried out prior to their entry into force. In addition, national legislation was not up-to-date and there was insufficient personnel with maritime expertise to assist in the promulgation of national laws and in discharging all responsibilities of the State (SOLAS 1974, article I; MARPOL, article 1; LL 1966, article 1; III Code, paragraph 4; III Code, paragraph 8.1; III Code, paragraph 8.3).

Root cause

25 The following factors contributed to this finding:

- .1 prolonged process for the transposition of the mandatory IMO instruments and their amendments into national legislation;
- .2 lack of coordination among relevant maritime agencies; and
- .3 absence of a dedicated unit responsible for managing and monitoring the developments of IMO requirements and domestic legislation.

Corrective action

26 The State will implement the following actions:

- .1 develop and implement a process for timely transposition of the mandatory IMO instruments and their amendments into domestic legislation;
- .2 establish a platform among the relevant agencies to periodically review and coordinate the development of related maritime legislation;
- .3 assign/establish a dedicated division/unit to oversee the coordination, management and review of matters related to the mandatory IMO instruments and their amendments, including their timely transposition into domestic legislation;
- .4 provide training in maritime law to the personnel in the maritime administration (e.g. to the legal adviser, and the officers and other relevant maritime agencies) to enhance manpower with maritime legal expertise; and
- .5 place a legal adviser with a maritime law background in the Administration.

This corrective action will be completed by 30 June 2027.

FD

27 The State had not communicated some of the information to IMO as required by the mandatory IMO instruments with regard to legislation, reports under MARPOL, availability of fuel oil and information regarding recognition of certificates under STCW 1978, regulation I/10 and STCW Code, section A-I/7.3.2. In addition, the report on periodic independent evaluation pursuant to regulation I/8 of STCW 1978 was not communicated to IMO (SOLAS 1974, article III; MARPOL, article 8; MARPOL, article 11(1)(f); MARPOL, Annex VI, regulation 18.2.1; STCW 1978, regulation I/7; STCW 1978, regulation I/8.3; III Code, paragraph 9).

Root cause

28 The following factors contributed to this finding:

- .1 lack of procedures for communicating information to IMO; and
- .2 absence of a dedicated unit responsible for managing and monitoring the obligations related to communication of information to IMO in coordination with various maritime entities responsible.

Corrective action

29 The State will implement the following actions:

- .1 develop and implement a procedure to manage the information required to be communicated to IMO under the mandatory IMO instruments; and
- .2 assign/establish a dedicated division/unit to oversee the coordination, management and review of matters related to the mandatory IMO instruments, including the communication of relevant information to IMO.

This corrective action will be completed by 30 June 2027.

FD

30 The State had not established an appropriate mechanism for monitoring and reviewing the measures taken to effectively implement and enforce the mandatory IMO instruments and to facilitate continual improvement in the adequacy of these measures (III Code, paragraph 11).

Root cause

31 The following factors contributed to this finding:

- .1 no documented procedure was established for the periodic monitoring and review of the measures taken to effectively implement and enforce the mandatory IMO instruments, and for their continual improvement; and
- .2 no dedicated unit was established with the responsibility of monitoring and reviewing the measures taken to give effect to the mandatory IMO instruments.

Corrective action

32 The State will implement the following actions:

- .1 develop and implement a procedure for the overall monitoring, evaluation and review of the effective implementation and enforcement of the mandatory IMO instruments, and their improvement; and
- .2 assign/establish a dedicated unit to oversee the coordination, management and review of matters related to mandatory IMO instruments, including the measures taken to give effect to the mandatory instruments and for continual improvement.

This corrective action will be completed by 30 June 2027.

FD

33 Even though the maritime administration had a system to communicate mandatory information to IMO, there was evidence that some of the requirements related to the communication of information to IMO under the mandatory IMO instruments were not fully fulfilled (SOLAS 1974, article III; MARPOL, article 11(1)(c); III Code, paragraph 9).

Root cause

34 Although the maritime administration had a system to communicate mandatory information to IMO, the monitoring mechanism within the system was not tight enough to ensure that the communication requirements were fully met.

Corrective action

35 The maritime administration will strengthen the monitoring mechanism in order to ensure that all communication requirements under the mandatory IMO instruments are met, by:

- .1 assigning relevant duties to a designated post under the strengthened monitoring mechanism, whereby the officer holding that post is responsible to take up the duty of coordinating IMO reporting comprehensively within the State, while performing also the roles of continuous monitoring and timely review of the fulfilment of reporting requirements; and
- .2 reviewing effective implementation of this mechanism during the periodical interdepartmental meeting. This corrective action will be completed by 8 August 2025.

FD

36 The State did not communicate to IMO the information required by the mandatory IMO instruments to which it was Party, such as national legislation, specimens of certificates, information required by regulation I/7 of STCW 1978, list of ROs and information required under MARPOL 73/78 (MEPC/Circ.318) (SOLAS 1974, article III; MARPOL, article 11(1)(a); LL 1966, article 26; STCW 1978, article IV; STCW 1978, regulation I/7; TONNAGE 1969, article 15; III Code, paragraph 9).

Root cause

37 There was a lack of awareness, and no documented procedure was established to ensure that the required information under the applicable IMO instruments was communicated to the Organization.

Corrective action

38 The responsible State entities will implement the following actions:

- .1 the respective Ministry will designate a coordinating contact point for the communication of information to IMO. This individual will be trained in the use of GISIS platform;
- .2 all entities involved and their area of responsibility will be identified. These entities will establish reporting procedures and provide the contact point with relevant information to be communicated to IMO;
- .3 each entity will conduct an awareness programme involving all relevant personnel about the reporting requirements under the mandatory IMO instruments; and
- .4 each entity and subordinated institutions will establish and periodically review a monitoring system related to the communication of information to IMO.

This corrective action will be completed by 30 April 2026.

FD

39 Several entities of the State did not have a documented procedure to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records (III Code, paragraph 10).

Root cause

40 There was a lack of knowledge of the scope of requirements for record keeping in accordance with the III Code.

Corrective action

41 The entities comprising the maritime administration will implement the following actions:

- .1 conduct an awareness programme involving all relevant personnel about the requirements of the III Code concerning record keeping; and
- .2 develop, implement and review documented procedures for record-keeping, in accordance with the requirements of the III Code, for their activities stemming from the relevant mandatory IMO instruments.

This corrective action will be completed by 30 April 2026.

FD

42 Transposition of the applicable mandatory IMO instruments and their amendments into national legislation, including those amendments entering into force under the tacit amendment procedure and the amendments to the international codes, were not carried out. In addition, the availability of personnel with maritime expertise to assist in promulgating the necessary national laws and discharging all the responsibilities of the State was not sufficient (SOLAS 1974, article I; MARPOL, article 1; STCW 1978, article I; LL 1966, article 1; TONNAGE 1969, article 1; COLREG 1972, article I; III Code, paragraph 8).

Root cause

43 The following factors contributed to this finding:

- .1 the absence of a system for tracking the mandatory IMO instruments and their amendments;
- .2 lack of legal mechanism in place to systematically develop policies and guidance for mandatory IMO instruments to which the State was a Party;
- .3 inadequate commitment of all the entities comprising maritime administration; and
- .4 lack of sufficient personnel with maritime expertise - legal and technical - to carry out transposition of the mandatory IMO instruments into national legislation.

Corrective action

44 The responsible State entities will implement the following actions:

- .1 the respective Ministries and the main entity of the maritime administration will develop and implement a system for tracking the mandatory IMO instruments and their amendments;

- .2 the respective Ministry and the main entity of the maritime administration will establish a legal mechanism to systematically develop policies and guidance for mandatory IMO instruments to which the State is Party;
- .3 the respective Ministries and the main entity of the maritime administration will update the maritime legislation gap analysis, based on the WMU/consultancy company document dated July 2021;
- .4 the respective Ministries and the main entity of the maritime administration will draft a road map and action plan for the transposition, implementation and enforcement of appropriate mandatory IMO instruments and further amendments;
- .5 the respective Ministries and the main entity of the maritime administration will recruit and train qualified personnel with maritime/legal background to implement planned actions;
- .6 the respective Ministries and the main entity of the maritime administration will transpose all mandatory IMO instruments and amendments into national legislation; and
- .7 comprehensive approach focusing on organizational collaboration and accountability of entities comprising maritime administration will be implemented, in line with the strategy to be developed.

This corrective action will be completed by 31 January 2026.

FD

45 There was no objective evidence to demonstrate that the State continually improved the adequacy of the measures taken to give effect to the applicable mandatory IMO instruments through rigorous and effective application and enforcement of national legislation, guidance and instructions, as appropriate, and monitoring of compliance. Additionally, the State did not take action to eliminate the causes of non-conformities and potential non-conformities (III Code, paragraph 11; III Code, paragraph 13; III Code, paragraph 14).

Root cause

46 The following factors contributed to this finding:

- .1 absence of assigned responsibilities and coordination among government entities involved in the implementation and enforcement of the mandatory IMO instruments; and
- .2 insufficient resources and lack of awareness of the need for continuous monitoring and improvement, stemming from the III Code.

Corrective action

47 The responsible entities of the State will implement the following actions:

- .1 develop and implement a mechanism to collect the information from the respective entities comprising maritime administration to monitor and periodically evaluate the State's performance;

- .2 use the aforementioned periodical review and evaluation mechanism so that the State can identify existing and potential shortcomings in the implementation and enforcement of the requirements stemming from the mandatory IMO instruments and take timely corrective actions, as necessary, prevent recurrences as well as take measures for stimulating a safety culture;
- .3 recruit and train qualified personnel, and
- .4 carry out an awareness programme, concerning the continuous monitoring and improvement, stemming from the III Code.

This corrective action will be completed by 30 April 2026.

FD

48 The provisions of amendments to the mandatory IMO instruments had not been consistently implemented and enforced through appropriate national legislation. Additionally, the pollution prevention ordinance of the State did not accurately reflect the requirements of MARPOL concerning the application of MARPOL to ships of non-Parties to ensure that no more favourable treatment was given to such ships. Additionally, the State did not fully reflect the requirements of the IMDG Code, as amended in its national legislation (SOLAS 1974, article I; MARPOL, article 1; MARPOL, article 5(4); STCW 1978, article I; III Code, paragraph 8).

Root cause

49 The following root causes contributed to this finding:

- .1 the frequent amendments to mandatory IMO instruments;
- .2 insufficient/limited awareness and resources for timely and consistent execution of amendments in national legislation;
- .3 lack of sufficient personnel with maritime legal expertise;
- .4 lack of appropriate organizational structures regarding involved entities;
- .5 lack of appropriate communication structure (internal/external);
- .6 insufficient awareness concerning the local resources; and
- .7 insufficient prioritization in programming.

Corrective action

50 The State will implement the following actions:

- .1 develop a structure to track amendments to mandatory IMO instruments and initiating timely transposition of amendments into national legislation;
- .2 review the maritime legislation through a gap-analysis and update the legislation, as appropriate;

- .3 provide training for the appointed personnel;
- .4 enhance cooperation among the entities to improve programming taking into consideration available local resources;
- .5 recruit additional personnel with maritime legal expertise and provide training on developing national maritime legislation to existing staff;
- .6 adopt a dynamic reference system on the incorporation of amendments into national legislation.
- .7 develop and implement a quality management system; and
- .8 establish an appropriate organizational structures in close cooperation with all entities, including clear communication protocols between all entities within the administration.

This corrective action will be completed by 14 April 2027.

FD

51 The State had not communicated all information to IMO as required by the relevant IMO instruments to which it was a Party, including the communication to IMO of the independent evaluation report as required by STCW 1978, regulation I/8 (SOLAS 1974, article III; MARPOL, article 11(1)(a); MARPOL, Annex VI, regulation 18.9.6; LL 1966, article 26; TONNAGE 1969, article 15; STCW Code, section A-I/7, paragraph 3.3; STCW 1978, regulation I/8.3; III Code, paragraph 9).

Root cause

52 The following factors contributed to this finding:

- .1 lack of clear and concise policies, at the State level, for the communication and reporting of information to IMO;
- .2 lack of complete awareness, knowledge and understanding of the mandatory information required to be communicated and reported to IMO and/or interested parties;
- .3 lack of coordination and communication among various government entities of the State responsible for communicating information to IMO;
- .4 lack of a clear structure with appointed personnel by defined function, task, responsibilities and assignment within the responsible State government entities and allocation of sufficient resources to perform their tasks;
- .5 lack of an appropriate monitoring system per country, with supervision on the State level in order to achieve full and complete compliance with the reporting requirements emanating from the mandatory IMO instruments;
- .6 lack of sufficient knowledge of GISIS functionalities and use of the relevant available modules by all personnel responsible for reporting requirements; and
- .7 lack of user-friendliness of the IMO GISIS site.

Corrective action

53 The maritime administration will implement the following actions:

- .1 the national IMO coordinator will coordinate the development and implementation of national policies for communication and reporting requirements emanating from the mandatory IMO instruments from all the responsible government entities to IMO;
- .2 the national IMO coordinator, will review the existing mechanism and documented procedure, based on the adopted policies, to further improve them and clearly identify all the requirements of the applicable mandatory IMO instruments related to the communication of information to IMO;
- .3 a relevant documented procedure will be established and implemented;
- .4 the responsible entities will formally appoint personnel responsible for the communication of information to IMO and will allocate sufficient resources;
- .5 an appropriate monitoring system will be developed and implemented to monitor compliance with the reporting requirements emanating from the mandatory IMO instruments;
- .6 the appointed IMO coordinator will provide the appropriate instructions and training to facilitate appropriate use GISIS; and
- .7 the appointed IMO coordinator, will contribute to the discussions at IMO to enhance the user-friendliness of the GISIS system.

This corrective action will be completed by 1 May 2026.

FD

54 The State did not have a documented procedure in place to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records (III Code, paragraph 10).

Root cause

55 The following factors contributed to this finding:

- .1 insufficient technical and financial resources were available for the development of the documented procedure; and
- .2 there was no established legal basis for archiving.

Corrective action

56 The maritime administration will implement the following actions:

- .1 allocate the necessary technical and financial resources;
- .2 develop and implement a records management procedure that includes policies, processes, and controls for documentation and record keeping;

- .3 monitor compliance with the established procedure; and
- .4 finalize, adopt, and implement the draft legislation on archiving.

This corrective action will be completed by 16 April 2027.

FD

57 There was no objective evidence to demonstrate that the maritime administration continuously improved the measures taken to give full and complete effect to some of the mandatory requirements, including monitoring of compliance for some of the coastal and port State activities (III Code, paragraph 11).

Root cause

58 Some functions related to coastal and port State activities assigned to the respective State's entities and their subsidiary bodies in charge have not been duly and fully implemented, and the absence of clear procedures of periodic compliance monitoring for some of the coastal and port State activities contributed to this finding.

Corrective action

59 The maritime administration will establish a coordination body for cooperation with IMO and a procedure for evaluation of the maritime administration, with a mandate to continuously improve the measures taken to give full and complete effect to the mandatory requirements of compliance, monitoring and improvement of the State as coastal and port State activities. In addition, responsibility, to a designated official person, for monitoring the analysis of the coastal and port State performance will be assigned. This corrective action will be completed by 31 December 2025.

Observations (OB)

60 Although the State had developed an overall strategy and a methodology to monitor and evaluate it, said strategy had not been fully subjected to a continuous review to achieve, maintain and improve the overall organizational performance and capability as a flag, coastal and port State. Furthermore, a National Maritime Coordination Committee had not yet been established through a legal mandate defining its duties and functions (III Code, paragraph 3).

Root cause

61 The overall strategy had been developed shortly preceding the audit (2021), therefore, the methodology to monitor and evaluate it had not been implemented. Furthermore, the formalization of this document and linkage with the other entities that composed the Coordination Committee of the National Maritime Administration was in an approval phase by the Ministry of Defense.

Corrective action

62 The State will implement the following actions:

- .1 the entities of the State comprising the maritime administration will develop political initiatives to formalize the National Maritime Coordination Committee through a respective legal mandate in which its tasks and functions will be clearly defined in relation to the overall strategy; and

- .2 once the National Maritime Coordination Committee is formalized, the overall strategy will be monitored and evaluated based on the already established methodology in order to achieve, maintain and improve the results and the general organizational capacity as a flag, coastal, and port State. In addition, said evaluation will serve as a method of adjusting the system and the existing key performance indicators (KPI).

This corrective action will be completed by 31 December 2025.

OB

63 The State had developed an overall strategy comprised of a maritime agenda 2025 and also an IMO strategy 2022-2023 to ensure that its international obligations and responsibilities as a flag, port and coastal State were met. In addition, regular meetings were conducted with responsible entities of the State on IMO issues for coordinating activities to fulfil obligations stemming from the mandatory IMO instruments and to contribute to the strategy. Also, an oversight monitoring programme of the subsidiary entities responsible for the implementation and enforcement of mandatory IMO instruments was established and carried out. However, the State could not demonstrate that a mechanism was in place to monitor and assess that the strategy ensured the effective implementation and enforcement of the mandatory IMO instruments as well as a methodology for continuous review of the strategy (III Code, paragraph 3.2; III Code, paragraph 3.3).

Root cause

64 Due to the COVID-19 pandemic which shifted focus on new tasks, significant progress in advancing the "IMO strategy" had not been achieved over the last two years.

Corrective action

65 The development of the IMO strategy will continue. The next step involves determining options for establishing a procedure to monitor the overall strategy's implementation and conduct for regular reviews. In addition, a chapter will be incorporated into the strategy outlining how the State ensures the effective implementation and enforcement of relevant binding mandatory IMO instruments. This corrective action will be completed by 1 July 2026.

OB

66 Although the State had a strategic framework, it did not fully comply with paragraph 3 of the III Code towards a comprehensive overall strategy to ensure that all its obligations and responsibilities under the mandatory IMO instruments were met (III Code, paragraph 3).

Root cause

67 Development of a strategy for ensuring that the State's responsibilities and obligations are implemented has not been prioritized given the desire to respond to other government policy directions.

Corrective action

68 The State will develop a collective picture outlining the State's obligations and responsibilities under the mandatory IMO instruments, while undertaking a review of the State's primary maritime legislation that will ensure the State maintains alignment with the

mandatory IMO instruments. This will help to form an overall strategy ensuring that the obligations and responsibilities under the mandatory IMO instruments, including the III Code are met. This corrective action will be completed by 31 July 2026.

OB

69 Although the State had a number of general strategies and policies in place, they did not constitute an overall strategy for covering all of its obligations and responsibilities under the mandatory IMO instruments addressing flag, coastal and port State activities; including a methodology to monitor and assess the effectiveness of the implementation and the enforcement of the mandatory IMO instruments, and a mechanism to continuously review the strategy to ensure the improvement of the overall organizational performance and capability of the State (III Code, paragraph 3).

Root cause

70 An overall strategy, as recommended by the III Code, was not established at the time of the audit because of insufficient resources.

Corrective action

71 In collaboration and coordination with all concerned entities comprising the maritime administration of the State, the potential for improvement in achieving the strategy's goals will be assessed with the view to define and include methodology to monitor and assess implementation and enforcement, including a mechanism to continuously review the strategy. This corrective action will be completed by 1 July 2027.

OB

72 The methodology for assessing the existing overall strategy of the State was not robust enough to ensure the complete monitoring and assessment of the strategy to verify the effective implementation and enforcement of the mandatory IMO instruments in all the areas of obligations of the State. In addition, a system for continuous review of the strategy to achieve, maintain and improve the overall organizational performance and capabilities as a flag, port and coastal State had not yet been fully established (III Code, paragraph 3.2; III Code, paragraph 3.3).

Root cause

73 The overall maritime strategy had been adopted shortly preceding the audit, therefore it was not subject to continuous review and did not cover all relevant entities comprising the maritime administration of the State and monitoring of their performance on regular basis.

Corrective action

74 The State will implement the following actions:

- .1 establish a technical committee consisting of entities comprising the maritime administration of the State, which will be tasked to review and amend existing methodology for assessing the overall strategy to ensure the effective implementation and enforcement of mandatory IMO instruments in all the areas of obligations of the State; and

- .2 the established special Commission to the Council of Ministers on Maritime Safety and Protection of the Environment from Pollution from Ships will develop and implement a system for continuous review of the strategy to achieve , maintain and improve the overall organizational performance and capabilities of the State. The aforementioned review will be carried out on yearly basis.

This corrective action will be completed by 1 July 2025.

OB

75 As the State had developed the overall strategy to ensure that its international obligations and responsibilities are met shortly before the audit, the methodology to monitor and assess the strategy was not fully implemented to achieve, maintain and improve the overall organizational performance and capability as flag, coast and port State (III Code, paragraph 3.3).

Root cause

76 The following factors contributed to this observation:

- .1 insufficient time for full implementation of the strategy, including the development of mechanisms for continuous evaluation and review of overall performance as a flag, coastal and port State; and
- .2 lack of coordination among relevant maritime entities responsible for the implementation of mandatory IMO instruments.

Corrective action

77 The State will implement the following actions:

- .1 the steering committee will oversee the implementation and assessment of the overall strategy, as well as conduct regular review of the performance and capability of the State as a flag, coastal and port State; and
- .2 the steering committee will coordinate with relevant maritime entities and conduct periodical meetings on matters related to the implementation of the III Code.

This corrective action will be completed by 30 June 2027.

OB

78 Although the entities in the maritime administration evaluated their performance individually in respective functional areas, an overall strategy that fulfilled the requirements of the III Code could not be fully demonstrated (III Code, paragraph 3).

Root cause

79 There was no formal engagement amongst the entities to discharge the obligations of the mandatory IMO instruments in relation to flag State, coastal State and port State.

Corrective action

80 The nodal entity, in close collaboration with other entities, will set up an interdepartmental collaboration system, to:

- .1 assist in establishing and implementing by all entities comprising the maritime administration, an overall strategy as recommended by paragraph 3 of the III Code;
- .2 conduct periodical meetings to review and evaluate the performance of the maritime administration under the III Code;
- .3 facilitate continuous improvement of the overall organizational performance to ensure full compliance with performance pledges; and
- .4 maintain the capability in and enhance the fulfilment of duties under the mandatory IMO instruments.

This corrective action will be completed by 8 August 2025.

OB

81 Although the State developed a strategy for transport and logistics, it did not constitute an overall strategy of the State to fully meet its obligations and responsibilities under the applicable mandatory IMO instruments (III Code, paragraph 3).

Root cause

82 The following factors contributed to this observation:

- .1 inadequate understanding of recommendations for an overall strategy that includes all relevant entities responsible for implementing the mandatory IMO instruments;
- .2 lack of formalized mechanism identifying responsible entities, functions, and inter-agency coordination for the implementation of relevant IMO instruments, including monitoring and periodic review of the overall maritime strategy, as recommended by the III Code; and
- .3 inadequate commitment of all the entities comprising maritime administration.

Corrective action

83 The State will implement the following actions:

- .1 develop and implement, with the assistance of a regional agency to which the State is a member, the national maritime overall strategy for implementing the mandatory IMO instruments;
- .2 establish a national coordinating body under the respective Ministry, comprising all entities responsible for the implementation of the mandatory IMO instruments ensuring the commitment of all entities involved;

- .3 communicate the strategy to all concerned;
- .4 establish a methodology to continuously monitor and assess that the strategy and ensure effective implementation of the mandatory IMO instruments;
- .5 train all relevant personnel on matters related to the recommendations of the III Code for overall strategy; and
- .6 establish a methodology to review the national maritime overall strategy.

This corrective action will be completed by 31 December 2025.

OB

84 The strategy developed by the responsible ministry did not ensure that the State's international obligations and responsibilities as a flag, port and coastal State were met and did not establish a methodology to monitor and assess that the strategy ensured effective implementation and enforcement of the mandatory IMO instruments. Additionally, the strategy was not continuously reviewed to achieve, maintain and improve the State's overall organizational performance and capability as a flag, port and coastal State (III Code, paragraph 3).

Root cause

85 The following factors contributed to this finding:

- .1 insufficient awareness of the recommendations of the III Code concerning the overall strategy;
- .2 insufficient coordination among the entities comprising the maritime administration; and
- .3 insufficient clarity regarding the specific responsibilities of each entity within the maritime administration.

Corrective action

86 The State will implement the following actions:

- .1 establish an inter-institutional group comprising representatives from all relevant entities and stakeholders, under the coordination of the relevant ministry, to develop a framework document and a policy statement that will progressively become the overall maritime strategy;
- .2 conduct a training programme for all relevant personnel concerning the recommendations of the III Code for the overall strategy;
- .3 determine the stages for gradual implementation of the overall strategy and the responsibilities of each of the relevant entities; and
- .4 develop and implement an overall maritime strategy of the State fulfilling all the recommendations of paragraph 3 of the III Code.

This corrective action will be completed by 30 June 2026.

FLAG STATE ACTIVITIES

Findings (FD)

87 Although national legislation had been put in place to implement the requirements of the STCW 1978 Convention, no objective evidence was found to demonstrate that the Administration had established processes to ensure effective compliance in areas related to the recognition of certificates and policies regarding fitness for duty and watchkeeping arrangements (STCW 1978, regulation I/10; STCW 1978, regulation VIII/1.1; III Code, paragraph 16.3).

Root cause

88 The following factors contributed to this finding:

- .1 there was a lack of policies within the Administration regarding requirements of STCW 1978, regulation I/10; and existing national legislation did not cover issuing endorsements to foreign seafarers; and
- .2 lack of awareness of STCW 1978 requirements regarding the development of national regulations to assist in the effective implementation of matters related to the prevention of drug and alcohol abuse.

Corrective action

89 The Administration will implement the following actions:

- .1 develop and implement a directive regulating the arrangements to ensure compliance with STCW 1978, regulation I/10 and IMO guidelines in this respect;
- .2 within the framework of the National Maritime Coordination Committee, a work agenda will be established, to address the issues regarding the fitness for duty and watchkeeping arrangements, in order to promote the promulgation of policies for the maritime sector;
- .3 modify the maritime circular which incorporates IMO guidelines on prevention of drug and alcohol abuse. In addition, an inspection programme will be established to ensure compliance in this regard; and
- .4 to raise awareness, the Administration will develop and implement a training programme for all personnel dealing with STCW 1978 matters. Said programme will be periodically reviewed and kept updated.

This corrective action will be completed by 31 July 2025.

FD

90 The Administration had not fully implemented policies through the enactment of national legislation, administrative instructions and guidance to assist in the effective implementation and enforcement of all codes emanating from the mandatory IMO instruments to which the State was a Party (III Code, paragraph 15; III Code, paragraph 16.1).

Root cause

- 91 The following factors contributed to this finding:
- .1 lack of awareness regarding a comprehensive approach in implementing mandatory codes stemming from the mandatory IMO instruments; and
 - .2 lack of experienced personnel for monitoring requirements of the mandatory codes stemming from the mandatory IMO instruments in order to modify or adapt policies, regulations and internal procedures to ensure their effective implementation and enforcement.

Corrective action

- 92 The Administration will implement the following actions:
- .1 update the document on the permanent policies of the maritime authority on flag State activities, in relation to the need for the implementation of all mandatory IMO instruments through national legislation, and administrative instructions;
 - .2 review existing legislation to address where new legislation or administrative instructions needs to be developed, drafted or adopted. This review will also include mandatory codes stemming from the mandatory IMO instruments for the same purpose;
 - .3 develop a maritime directive to establish a methodology to ensure that formal documented processes are in place to consider aspects, among others, related to training of personnel of the Administration on these matters; issuance of policies and administrative instructions, inspection procedures, and monitoring measures to ensure the effective implementation of mandatory Codes stemming from mandatory IMO instruments;
 - .4 appropriate national legislation will be developed and implemented accordingly; and
 - .5 in-house training will be delivered to raise awareness and knowledge after the review of the maritime authority's policies on flag State and will also include provisions of the new maritime directive to be established.

This corrective action will be completed by 31 December 2025.

FD

93 Although the Administration had concluded agreements with ROs, they were not in accordance with the minimum requirements of the RO Code. In addition, the Administration had not implemented the existing programme for supervision and monitoring of the delegation tasks delegated to ROs (SOLAS 1974, regulation XI-1/1; RO Code, part 2, section 1.2 and appendix 3; RO Code, part 2, section 8; III Code, paragraph 18.2; III Code, paragraph 20).

Root cause

94 Due to the existing prolonged legislative process, the RO Code had been incorporated into national legislation shortly preceding the audit, therefore the agreements with the ROs as well as the oversight programme of the ROs were not in accordance with the RO Code and the III Code.

Corrective action

95 The Administration will implement the following actions:

- .1 establish a working programme with the ROs, to update existing agreements, based on the requirements of the RO Code and the recommendations in circular MSC-MEPC.5/Circ.16; and
- .2 review and update existing related resolution on monitoring of ROs' activities in line with the recommendations of the RO Code. In addition, the Administration will establish an oversight programme schedule for ROs in accordance with the internal resolution on ROs monitoring, as amended.

This corrective action will be completed by 31 December 2025.

FD

96 The existing arrangements for conducting casualty investigations did not fully guarantee the impartiality and objectivity of the investigators. In addition, the powers to conduct investigations were not included or established in national legislation and the guidelines to assist investigators in applying the Casualty Investigation Code, adopted by the Organization, were not taken into account (SOLAS 1974, regulation XI-1/6; Casualty Investigation Code, paragraph 8.1; Casualty Investigation Code, paragraph 11.1; III Code, paragraph 38; III Code, paragraph 41).

Root cause

97 Lack of awareness of all the requirements of the Casualty Investigation Code and the III Code on arrangements to conduct maritime safety investigations.

Corrective action

98 The Administration will implement the following actions:

- .1 the Investigation and Analysis of Maritime Accidents Unit will review and modify the respective directive which regulated the arrangements for conducting the investigations of maritime accidents, taking into account the following:
 - .1 establishing clear criteria and guidelines to ensure the impartiality and objectivity of the investigators and adoption of the guidelines to assist investigators in applying the Casualty Investigation Code;
 - .2 once the investigation is concluded, the Unit will be responsible for verifying that the investigators have complied with the procedure established in the modified respective directive, ensuring that it has been carried out in an impartial and objective manner, according to the new developed criteria and guidelines, and
 - .3 the Unit will verify the full compliance with the respective technical procedure, before starting an investigation, to ensure that appointed investigators to the casualty had signed the "Declaration of Impartiality and Objectivity".

- .2 the Unit will prepare a maritime circular, to regulate the powers of investigators in accordance with the provisions of the Casualty Investigation Code. Once the circular is developed, it will be uploaded to the Administration's website and published in the Official Gazette; and
- .3 in-house training will be delivered regarding the new arrangements for conducting casualty investigations once relevant provisions are delivered and implemented.

This corrective action will be completed by 31 December 2025.

FD

99 Although there was a legal basis to address provisions left "to the satisfaction of the Administration", or equivalent, there was no robust evidence provided to confirm that the Administration developed a system to address, establish and document the interpretation and guidance concerning each of the requirements left to the satisfaction of the Administration in the mandatory IMO instruments, including the mandatory codes (III Code, paragraph 16.5).

Root cause

100 The Administration had been unaware that the III Code, paragraph 16.5, requires flag States to have a general system and process in place concerning how to deal with the requirements left "to the satisfaction of the Administration", or equivalent. Instead, instructions were given on a case-by-case basis but not in a systematic manner.

Corrective action

101 The Administration will implement the following actions:

- .1 review of all guidance and instructions developed so far on a case-by-case basis, convert them to the extent possible into general guidance and instructions and make them publicly available;
- .2 develop a mechanism to provide guidance or instruction on arrangements that are to be "to the satisfaction of the Administration" or equivalent;
- .3 establish and implement a process to provide guidance as required; and
- .4 complete and publish the relevant documentation on the website of the Administration.

This corrective action will be completed by 31 December 2025.

FD

102 Although the agreements between the Administration and ROs were in place, these did not contain all the elements set out in the relevant IMO instruments. In addition, the Administration had not provided specific instructions to ROs in the event that a ship, entitled to fly the flag of the State, is found unfit to proceed to sea without danger to the ship or persons on board or is found to present an unreasonable threat of harm to the marine environment (SOLAS 1974, regulation XI-1/1; RO Code, part 2, section 8; III Code, paragraph 18.2; III Code, paragraph 18.3).

Root cause

103 The following factors contributed to this finding:

- .1 new RO agreements, which comply with the applicable IMO instruments, have not yet entered into force due to the ongoing coordination process between ROs and the Administration; and
- .2 a lack of awareness regarding the RO Code requirements to have specific instructions in place.

Corrective action

104 The Administration will implement the following actions:

- .1 finalize and sign new RO agreements that comply with the applicable IMO instruments;
- .2 develop and implement specific instructions for ROs in accordance with paragraph 18.3 of the III Code; and
- .3 establish and implement a mechanism and process to develop instructions for ROs.

This corrective action will be completed by 31 December 2025.

FD

105 Although there was a system in place for the Administration to evaluate its performance in conducting flag State activities, the administrative processes, procedures, updates of IMO resolutions in national legislation and resources necessary to carry out the flag State inspection (FSI) programme had not been assessed during the evaluation in order to ensure necessary changes in legislation and the FSI programme (III Code, paragraph 42).

Root cause

106 The following factors contributed to this finding:

- .1 the delay in budget approval led to a lack of financial resources, resulting in a lack of personnel that is necessary to carry out the flag State inspection (FSI) programme; and
- .2 there has been no evaluation of existing administrative processes and procedures to ensure that flag State activities align with updated IMO requirements as implemented in national law.

Corrective action

107 The Administration will implement the following actions:

- .1 allocate and implement the budget necessary for the effective execution of the flag State inspection (FSI) programme;

- .2 review and evaluate existing administrative processes and procedures, including the implementation of updates in national legislation; and
- .3 develop a mechanism for the periodic evaluation of these processes and procedures to ensure that national legislation, administrative processes, procedures and resources remain up to date.

This corrective action will be completed by 31 December 2025.

FD

108 The Administration had not established resources and processes capable of administering a safety and environmental protection programme, which includes:

- .1 administrative instructions to effectively implement the mandatory IMO instruments and their amendments to which the State is a Party; and
- .2 provisions to address those requirements that are left 'to the satisfaction of the Administration', or equivalent and criteria for type approval of materials and equipment as required in the mandatory IMO instruments

(SOLAS 1974, regulation II-1/3-6.2.1; SOLAS 1974, regulation V/1.4; MARPOL, Annex I, regulation 14.3; III Code, paragraph 16.1; III Code, paragraph 16.5).

Root cause

109 Inadequate resourcing and a lack of prioritization in developing operational policy to give effect to IMO obligations resulted in the Administration's failure to develop the necessary rules and operational policies for the effective implementation of a number of the mandatory IMO instruments, including provisions for which there is discretion.

Corrective action

110 The Administration will implement the following actions:

- .1 develop new policy frameworks and work programmes to build capability in operational policy and practice, as part of the evolving organizational strategy; and
- .2 develop processes and systems that ensure all IMO obligations were identified and transposed into domestic rules and other instruments in a manner that provides clear guidance to operational teams in instances where the obligation allows for discretion.

This corrective action will be completed by 31 December 2025.

FD

111 There was no evidence that the Administration had:

- .1 determined that the RO had adequate resources in terms of technical, managerial and research capabilities;
- .2 issued specific instructions to ROs detailing actions to be followed in the event a ship is found unfit to proceed to sea; and

- .3 established or participated in an oversight programme with adequate resources for monitoring of, and communication with, its ROs and nominated surveyors

(SOLAS 1974, regulation XI-1/1; RO Code, part 2, section 8; III Code, paragraph 18.1; III Code, paragraph 18.3; III Code, paragraph 20).

Root cause

112 The specific finding arises from a lack of adequate resourcing for third-party monitoring and oversight by the Administration. The Administration has authorized over 250 third parties to variously perform 23 different regulatory functions but to date has not had adequate resources to take a systematized and comprehensive oversight approach. This has led to inconsistencies and gaps in oversight of, support for and instructions to third parties; including those identified in this finding.

Corrective action

113 A forthcoming review of the Administration's funding arrangements will include consideration of the capacity and capability needed to provide for proper third-party oversight. Following identification and allocation of sufficient resources, the specific gaps identified in the finding will be addressed to ensure a system is established that provides ongoing monitoring of third parties. This corrective action will be completed by 31 December 2025.

FD

114 In case of detention of a ship entitled to fly the flag of the State, the Administration did not ensure that appropriate corrective measures were taken to bring the ship in question into immediate compliance with the applicable IMO instruments (III Code, paragraph 25).

Root cause

115 A lack of focused resourcing on flag State control led to a failure to take a systematized and comprehensive oversight approach on flag State responsibilities, including documenting and fully assuring processes for following up on flagged ships detained overseas, which is ultimately a rare occurrence given the size of the fleet.

Corrective action

116 The Administration will develop operational practice, processes and systems to ensure that the flag State work of the newly established team will reflect and give full effect to IMO obligations, including those identified in this finding, and have in-built quality assurance and reporting elements as part of the operational policy and practice framework of the Administration. This corrective action will be completed by 31 December 2025.

FD

117 The Administration had not defined or documented the responsibilities, authority and interrelation of all personnel who managed, performed and verified work relating to, and affecting safety and pollution prevention. There was no evidence available for a documented system for qualification of surveyors and continuous updating of their knowledge as appropriate to the tasks they are authorized to undertake (III Code, paragraph 28; III Code, paragraph 35).

Root cause

118 A lack of focused resourcing on flag State control, including adequate third-party monitoring by the Administration, led to a failure to take a systematized and comprehensive oversight approach on the flag State and port State responsibilities, which included a failure to adequately document roles and responsibilities in the Administration and amongst third parties.

Corrective action

119 With the establishment of a new maritime inspection team, the Administration has developed the necessary position descriptions and mandate to identify the various roles and responsibilities of personnel within the organization that manage, perform and verify flag State obligations. The Administration will develop a documentation system to ensure the continuous updating of the knowledge of the flag State surveyors with regard to the tasks they were authorized to undertake. This corrective action will be completed by 31 December 2025.

FD

120 The mandatory requirements of the Casualty Investigation Code had not been included into the procedures established by the Administration for conducting marine safety investigations (SOLAS 1974, regulation I/21; SOLAS 1974, regulation XI-1/6; Casualty Investigation Code, paragraph 1.3; III Code, paragraph 41).

Root cause

121 The Casualty Investigation Code has not been transposed into the domestic process of conducting marine safety investigations. Specifically, the process did not explicitly require marine safety investigation into every very serious marine casualty involving convention-size ships flagged with the State.

Corrective action

122 The processes and procedures for conducting marine safety investigations have been reviewed and updated. This corrective action will be completed by 31 December 2024.

FD

123 The system implemented by the Administration to address those requirements left "to the satisfaction of the Administration", or equivalent in the mandatory IMO instruments was found not sufficiently robust to ensure that such requirements were identified and addressed accordingly (III Code, paragraph 16.5).

Root cause

124 The Administration has not implemented specific procedures that establish responsibilities and controls relevant for developing and deciding on provisions which are necessary to cater for and cover requirements that are left "to the satisfaction of the Administration", or equivalent. Further, the Administration has neither developed nor implemented training programmes aimed at case-handlers who in their capacity as surveyors must deal with requirements which are left "to the satisfaction of the Administration", or equivalent.

Corrective action

125 The Administration will implement the following actions:

- .1 develop and adopt procedures that establish responsibilities and associated controls for developing and deciding on provisions which are necessary for and cover applicable requirements in international instruments that are left "to the satisfaction of the Administration", or equivalent;
- .2 implement a transparent repository for provisions which are necessary for and cover applicable requirements in IMO instruments that are left "to the satisfaction of the Administration", or equivalent; and
- .3 develop and implement a training programme aimed inter alia at case-handlers who in their capacity as surveyors must deal with requirements which are left "to the satisfaction of the Administration", or equivalent.

This corrective action will be completed by 1 July 2027.

FD

126 Although the Administration had developed and implemented national legislation and guidance for various technical areas applicable to ships flying the flag of the State, the implementation mechanism was not robust enough to effectively discharge the Administration's responsibilities and obligations, in particular:

- .1 by issuing administrative instructions to assist in the implementation of the mandatory IMO instruments; and
- .2 by fully identifying and providing guidance or approved interpretations of those requirements that are left "to the satisfaction of the Administration", or equivalent in the applicable mandatory IMO instruments

(MARPOL, Annex II, regulation 6.3; LL 1966, annex 1, regulation 16(1); MARPOL, Annex II, regulation 13.4; LSA Code, paragraph 4.5.4; III Code, paragraph 16.1; III Code, paragraph 16.5).

Root cause

127 At the time of the audit, the Administration had not developed comprehensive administrative instructions addressing specific issues related to the applicable mandatory IMO instruments, due to the extremely small number of ships entitled to fly the flag of the State.

Corrective action

128 The Administration will implement the following actions:

- .1 conduct an assessment to identify the new instructions/regulations that needs to be drafted, to address requirements of mandatory IMO instruments to assist its effective implementation to be applied on board all ships, regardless of their type and size;

- .2 develop and implement policies/procedures for informing Administration's involved staff, shipowners, ROs, ports and other stakeholders regarding the new developed administrative instructions; and
- .3 establish policies and issue administrative instructions/regulations, interpretations and guidelines regarding those provisions left "to the satisfaction of the Administration", or equivalent, in the relevant mandatory IMO instruments.

This corrective action will be completed by 31 December 2025.

FD

129 Although the agreements between the Administration and ROs were in place, these had not been concluded in accordance with the requirements of the RO Code and did not contain the minimum elements. In addition, the Administration had not provided ROs with all appropriate instruments of national legislation, interpretations thereof giving effect to the provisions of the mandatory IMO instruments and any additional standards required by the Administration (SOLAS 1974, regulation XI-1/1; RO Code, part 2, section 8; III Code, paragraph 18.2; III Code, paragraph 18.4).

Root cause

130 The RO agreements were signed at different times where different requirements were applicable. There was no systematic process in place to ensure that agreements were revised according to new amendments to the relevant mandatory IMO instruments.

Corrective action

131 The Administration will implement the following actions:

- .1 adopt a unified model of the RO agreement, taking into account requirements of the RO Code and guidelines in this respect. Therefore, existing agreements will be reviewed and amended accordingly;
- .2 amend existing procedures on delegation of authority in accordance with requirements for periodic review of the content of agreements with ROs to ensure compliance with the applicable mandatory IMO instruments; and
- .3 provide ROs with all the appropriate instruments of national legislation, interpretations, thereof giving effect to the provisions of the mandatory IMO instruments, and any additional standards required by the Administration.

This corrective action will be completed by 1 July 2025.

FD

132 The Administration had not implemented policies through issuing national legislation and guidance, which would assist in the implementation and enforcement of the requirements of the mandatory IMO instruments, particularly regarding the type approval of radio equipment, implementation of the ISM Code, prevention of drug and alcohol abuse by seafarers and implementation of MARPOL requirements for fixed platforms (SOLAS 1974, regulation IV/14.1; SOLAS 1974, regulation IX/6.1; MARPOL, Annex I, regulation 39.2.2; STCW 1978, regulation VIII/1.2; III Code, paragraph 15.1).

Root cause

133 The following factors contributed to this finding:

- .1 lack of procedures to support the development and issuance of policies and guidance to assist the implementation and enforcement of the requirements of the mandatory IMO instruments;
- .2 lack of trained personnel to ensure effective mechanism for developing, establishing and revising relevant policies in a timely manner, as well as for implementing those policies; and
- .3 no dedicated unit was established with the responsibility for managing and monitoring the developments of the mandatory IMO requirements and to develop policies and guidance for implementation.

Corrective action

134 The Administration will implement the following actions:

- .1 establish and implement a procedure to develop and issue policies and guidance for the implementation and enforcement of the mandatory IMO instruments;
- .2 recruit sufficient personnel and provide appropriate training to ensure the implementation of relevant legislation/policies, and to ensure that the implementation is reviewed; and
- .3 assign/establish a dedicated division/unit to oversee the coordination, management and review of matters related to the mandatory IMO instruments, including the development of policies and guidance to assist their implementation.

This corrective action will be completed by 30 June 2027.

FD

135 The delegation of authority to ROs was not fully regulated and implemented in accordance with applicable requirements of the mandatory IMO instruments (SOLAS 1974, regulation XI-1/1; RO Code, part 2, section 8; III Code, paragraph 18.2).

Root cause

136 This finding was due to a lack of mutual consensus between the Administration and the majority of ROs in establishing the elements of the RO agreement, including the settlement of disputes, limit of liability and negligence.

Corrective action

137 The Administration will implement the following actions:

- .1 resume the discussion between the Administration and ROs to reach mutual consensus regarding the elements of the RO agreement stated in the RO Code and the III Code; and
- .2 conclude written agreements with ROs in accordance with the RO Code.

This corrective action will be completed by 30 June 2027.

FD

138 Although the Administration had established a legal framework to impose penalties, all violations of the provisions of the mandatory IMO instruments were not covered. Furthermore, rules providing for penalties for contraventions had not been developed as required under the primary law (MARPOL, article 6(4); III Code, paragraph 22.5).

Root cause

139 The following factors contributed to this finding:

- .1 relevant provisions regarding penalties in the primary law had not been reviewed;
- .2 amendments to penalty provisions in the primary law have been delayed due to a lengthy legislative process; and
- .3 insufficient training for personnel to assist with the regular review of relevant penalty provisions in national maritime legislation.

Corrective action

140 The Administration will implement the following actions:

- .1 conduct a review of the domestic maritime legislation, including provisions regarding penalties;
- .2 update penalty provisions in the primary law and related subsidiary legislation;
- .3 provide training in maritime law to personnel within the Administration (e.g. to the legal advisers and the officers and other maritime agencies) to enhance the maritime legal expertise of personnel; and
- .4 assign/establish a dedicated division/unit to oversee the management and review of matters related to the mandatory IMO instruments including their transposition into domestic legislation and provisions on penalties for contraventions.

This corrective action will be completed by 30 June 2027.

FD

141 The Administration had not sufficiently established a system to periodically assess its performance in fulfilling its flag State obligations and responsibilities under the mandatory IMO instruments (III Code, paragraph 42; III Code, paragraph 43).

Root cause

142 The following factors contributed to this finding:

- .1 lack of procedures and mechanisms for the periodic evaluation and review of performance as a flag State; and
- .2 absence of a dedicated unit for monitoring, reviewing, and analysing the performance and effectiveness of the implemented policies.

Corrective action

143 The Administration will implement the following actions:

- .1 develop and implement a procedure for evaluating and monitoring periodic assessments, and for reviewing the performance in the conduct of flag State activities; and
- .2 assign/establish a dedicated division/unit to oversee the coordination and management of matters related to the mandatory IMO instruments, and to periodically evaluate and review the performance in the conduct of flag State activities.

This corrective action will be completed by 30 June 2027.

FD

144 Although the Administration had a documented plan and identified the areas for continuously updating surveyors' knowledge, as appropriate to the tasks they were authorized to undertake, the plan was found not fully implemented (III Code, paragraph 35).

Root cause

145 Although the Administration had a documented plan with identified areas for continuously updating surveyors' knowledge, as appropriate to the tasks they were authorized to undertake, the plan did not include the procedure of covering the monitoring and review aspects thus causing some surveyors to not have received the training as per the training plan.

Corrective action

146 The Administration will implement the following actions:

- .1 develop and implement the documented training plan and establish a mechanism to ensure that surveyors will attend the identified trainings in a timely manner. There will also be a feedback mechanism and periodic review on the effectiveness of the training activities, to ensure that surveyors are continuously updating their knowledge, as appropriate, and will be well prepared to discharge their duties competently; and
- .2 review the effectiveness of the established mechanism during the periodic interdepartmental meeting.

This corrective action will be completed by 8 August 2025.

FD

147 The Administration adopted several policies and guidance to assist in implementing and enforcing the requirements of safety and pollution prevention conventions and protocols

to which the State was a Party. However, there was no mechanism in place to systematically develop policies and update guidance for all the safety and pollution prevention conventions and protocols to which the State was a Party (e.g. requirements for the electromagnetic compatibility of electrical and electronic equipment on the bridge or in the vicinity of the bridge; and arrangements for watchkeeping personnel serving on board ships flying the flag of the State). Additionally, responsibilities were not assigned within the Administration to review, update, and revise relevant policies adopted for flag State implementation, as necessary (SOLAS 1974, regulation V/1.4; SOLAS 1974, regulation V/17; STCW 1978, regulation VIII/1.1; III Code, paragraph 15).

Root cause

148 The following factors contributed to this finding:

- .1 lack of trained personnel;
- .2 absence of an effective mechanism within the Administration to develop, review, update, and revise relevant policies for the purpose of effective implementation and monitoring of compliance with the requirements of the mandatory IMO instruments; and
- .3 the legislative process in place did not always allow for the timely incorporation into national legislation of successive amendments to the mandatory IMO instruments.

Corrective action

149 The Administration will implement the following actions:

- .1 the respective Ministry, with the assistance of an external consulting company, will carry out an analysis of:
 - .1 distribution of responsibilities amongst entities subordinate to the Ministry;
 - .2 organizational structure;
 - .3 available resources;
 - .4 attractiveness of the positions of the sector; and
 - .5 the outcome of the analysis will serve as basis for decisions on the scale, distribution, profile and remuneration of personnel to be recruited and organizational structure.
- .2 the respective Ministry and involved entity of the State will recruit and train qualified personnel.
- .3 the respective Ministry and the main entity of the State will establish a documented mechanism and procedures for developing implementing and reviewing/updating policies to secure effective implementation and monitoring of compliance with the requirements of the mandatory IMO instruments.

This corrective action will be completed by 31 January 2026.

FD

150 The Administration issued endorsements attesting to the recognition of certificates of competency issued by other Parties to STCW 1978 based on national legislation adopted prior to the accession of the State to the STCW 1978 Convention. The Administration did not have a legal basis for implementing most of the provisions of the STCW 1978 Convention and did not conduct impartial investigations of reported failure, whether by act or omission, that may pose a direct threat to the safety of life or property at sea or the marine environment by the holders of endorsements issued by the Administration (III Code, paragraph 16.3).

Root cause

151 The following factors contributed to this finding:

- .1 lack of adequate resources;
- .2 lack of understanding of the requirements of regulation I/10 of STCW 1978;
- .3 lack of administrative arrangements with other parties to recognize the training, assessment and certification of seafarers; and
- .4 lack of procedures and personnel training to conduct impartial investigations of reported failure, whether by act or omission, that may pose a direct threat to the safety of life or property at sea or the marine environment by the holders of endorsements issued by the State.

Corrective action

152 The Administration will implement the following actions:

- .1 undertake a review of the implementation of the requirements of STCW 1978 with the assistance of external expertise;
- .2 implement the recommendation emanating from the review of the implementation of the requirements of STCW 1978 under action 1 above;
- .3 conclude agreements with the Parties concerned as required by STCW 1978, regulation I/10;
- .4 establish a mechanism for conducting periodic independent evaluations and report their results to IMO in accordance with the relevant requirements of the STCW 1978;
- .5 develop and implement procedures for the conduct of impartial investigations of reported failure, whether by act or omission, that may pose a direct threat to the safety of life or property at sea or the marine environment by the holders of endorsements issued by the State; and
- .6 recruit adequate personnel for above tasks and train all relevant personnel on the requirements of STCW 1978.

This corrective action will be completed by 30 April 2026.

FD

153 The Administration had not established resources and processes capable of administering a safety and environmental protection programme which includes:

- .1 administrative instructions to implement the mandatory IMO instruments to which the State was a Party and their amendments;
- .2 an independent audit and inspection programme covering the entity which issued the required certificates and documentation to ships entitled to fly the flag of the State;
- .3 the conduct of investigations into casualties and adequate and timely handling of cases involving ships with identified deficiencies; and
- .4 the development, documentation and provision of guidance to address those requirements that were left "to the satisfaction of the Administration", or equivalent and criteria for type approval of materials and equipment, as required in the applicable mandatory IMO instruments

(III Code, paragraph 16.1; III Code, paragraph 16.2; III Code, paragraph 16.4; III Code, paragraph 16.5).

Root cause

154 The following factors contributed to this finding:

- .1 there were insufficient human resources with appropriate maritime experience and qualifications to perform all the activities deriving from the proper implementation of the provisions of IMO instruments;
- .2 there was a lack of awareness and understanding of the measures to be undertaken by the Administration for the effective implementation of the mandatory IMO instruments, including the implementation of an independent audit and inspection programme;
- .3 there was an absence of appropriate instructions to effectively handle cases involving ships with identified deficiencies, or the procedures to be followed upon investigations into casualties; and
- .4 there was an absence of a system to address those criteria that are left "to the satisfaction of the Administration", or equivalent, as well as absence of processes for type approval of materials and equipment and alternative arrangements, according to the relevant applicable mandatory IMO instruments.

Corrective action

155 The Administration will implement the following actions:

- .1 recruit personnel with appropriate qualifications and maritime experience to perform all the activities required for the proper implementation of the provisions of the mandatory IMO instruments;

- .2 train new and existing personnel to ensure that:
 - .1 adequate administrative instructions are issued to ensure effective implementation of the mandatory IMO instruments to which the State was a Party; and
 - .2 the relevant personnel have adequate understanding of the measures to be taken by the Administration for the effective implementation of the mandatory IMO instruments, including the implementation of an independent audit and inspection programme;
- .3 develop and implement an independent audit and inspection programme, covering the issuance of certificates and documentation to ships entitled to fly the flag of the State, including a follow-up mechanism;
- .4 develop and implement a documented procedure on the follow up of detention of ships flying the flag of the State by port State control authorities;
- .5 develop and implement a documented procedure addressing requirements of the applicable IMO instruments that are left "to the satisfaction of the Administration", or equivalent, taking into account IMO guidelines and further IMO developments;
- .6 develop and implement a documented procedure for equivalence and alternative arrangements, as well as approval of materials and equipment; and
- .7 conduct investigations into casualties, and handle cases involving ships with identified deficiencies adequately and timely.

This corrective action will be completed by 30 April 2026.

FD

156 The Administration issued safe manning certificates to ships flying the flag of the State without taking into account all the relevant factors specified in the Principles of Safe Manning adopted by IMO (SOLAS 1974, regulation V/14; III Code, paragraph 17).

Root cause

157 There was insufficient knowledge and understanding of resolution A.1047(27) on the Principles of Safe Manning, which contributed to the lack of adequate measures in place for safe manning of ships flying the flag of the State.

Corrective action

- 158 The Administration will implement the following actions:
- .1 incorporate resolution A.1047(27) on the Principles of Safe Manning into national legislation through a government decision;
 - .2 develop and implement procedures to define minimum safe manning for each ship flying the flag of the State, in accordance with the guidelines contained in resolution A.1047(27); and

- .3 recruit qualified personnel and train new and existing personnel on matters related to the implementation of resolution A.1047(27).

This corrective action will be completed by 30 January 2026.

FD

159 The Administration did not:

- .1 update existing agreements with ROs to meet the mandatory requirements of the RO Code;
- .2 issue specific instructions to ROs detailing actions to be followed in the event that a ship was found unfit to proceed to sea without danger to the ship or persons on board, or is found to present an unreasonable threat of harm to the marine environment;
- .3 establish or participate in an oversight programme with adequate resources for monitoring of, and communication with, its ROs in order to ensure that its international obligations were fully met; and
- .4 communicate to IMO the list of ROs and the specific responsibilities and conditions of the authority delegated to them

(SOLAS 1974, regulation XI 1/1; LL 1966, annex 1, regulation 2; RO Code, part 2, section 2.1 ; III Code, paragraph 18.2; III Code, paragraph 18.3; III Code, paragraph 20).

Root cause

160 The following factors contributed to this finding:

- .1 insufficient knowledge and understanding of the requirements of the RO Code governing the authorization of ROs to act on behalf of the flag State;
- .2 lack of established ROs oversight programme; and
- .3 lack of trained staff within the Administration to carry out oversight functions.

Corrective action

161 The Administration will implement the following actions:

- .1 implement the legislation to regulate the delegation of authority to ROs;
- .2 review all existing RO agreements and update them as per requirements of the RO Code;
- .3 establish and implement and review an oversight programme according to the relevant requirements of the III Code;
- .4 recruit qualified personnel and train new and existing personnel on matters related to the requirements of the RO Code and III Code governing the authorization of ROs.

This corrective action will be completed by 30 April 2026.

FD

162 The Administration did not establish an organized periodic inspection programme for ships entitled to fly the flag of the State to verify that the actual condition of the ship and her crew conformed with the certificates she carried (III Code, paragraph 22.2).

Root cause

163 The following factors contributed to this finding:

- .1 insufficient qualified and trained human resources hindered the ability to conduct periodic inspections; and
- .2 lack of a comprehensive inspection programme for ships flying the flag of the State.

Corrective action

164 The Administration will implement the following actions:

- .1 recruit qualified flag State surveyors, based on the outcome of the analysis to be conducted with the assistance of external consultants, and update the knowledge of new and existing flag State surveyors through a documented system for continuous training; and
- .2 develop and implement and review a comprehensive inspection programme for ships flying the flag of the State.

This corrective action will be completed by 30 April 2026.

FD

165 The Administration did not investigate and report on marine safety investigations following serious marine casualties in accordance with the relevant IMO instruments and guidelines developed by the Organization (resolution A.1075(28)). Additionally, the Administration had no qualified investigators to conduct marine safety investigations of marine casualties and incidents (SOLAS 1974, regulation I/21; Casualty Investigation Code, paragraph 1.3; Casualty Investigation Code, paragraph 6.2; III Code, paragraph 38; III Code, paragraph 41).

Root cause

166 The following factors contributed to this finding:

- .1 the existing legal basis for conducting casualty investigations did not fully incorporate the Casualty Investigation Code and relevant requirements of the III Code;
- .2 no government entity has been legally mandated to undertake marine safety investigations; and
- .3 lack of qualified personnel to carry out marine safety investigations.

Corrective action

167 The Administration will implement the following actions:

- .1 establish an independent, dedicated entity to carry out marine safety investigations as per the relevant mandatory IMO requirements;
- .2 review the implementation requirements of the Casualty Investigation Code and update national legislation; and
- .3 recruit and train qualified personnel to carry out marine safety investigations.

This corrective action will be completed by 30 April 2026.

FD

168 The Administration did not implement a documented system for qualification and continuous updating of knowledge of flag State surveyors concerning the tasks they were authorized to undertake (III Code, paragraph 35).

Root cause

169 The following factors contributed to this finding:

- .1 lack of awareness of the qualification criteria applicable to surveyors under the III Code; and
- .2 lack of adequate resources within the Administration to develop and establish systems for qualification and continuous updating of knowledge of flag State surveyors.

Corrective action

170 The Administration will implement the following actions:

- .1 develop and implement a documented training programme to continuously update the knowledge of flag State surveyors;
- .2 train all relevant personnel on matters related to the recommendations and requirements of the III Code; and
- .3 recruit and train qualified personnel.

This corrective action will be completed by 30 January 2026.

FD

171 Although the Administration developed a four-tiered approach to deal with the requirements left "to the satisfaction of the Administration", or equivalent in the mandatory IMO instruments, not all relevant requirements were addressed (SOLAS 1974, regulation II-2/13.3.2.6.2; LSA Code, paragraph 6.1.2.9; III Code, paragraph 16.5).

Root cause

172 The following factors contributed to this finding:

- .1 absence of clear instructions and procedures, including the assignment of responsibilities, for addressing requirements left "to the satisfaction of the Administration", or equivalent;
- .2 lack of a comprehensive inventory of such requirements;
- .3 absence of documented feedback and records regarding the policies adopted for cases left "to the satisfaction of the Administration", or equivalent; and
- .4 insufficient resources allocated to address these requirements.

Corrective action

173 The responsible entities in the relevant jurisdictions will implement the following actions:

- .1 develop and implement a process concerning the requirements left "to the satisfaction of the Administration", or equivalent;
- .2 develop an inventory of the requirements left "to the satisfaction of the Administration", or equivalent;
- .3 assign additional extra resources to address the historical requirements left "to the satisfaction of the Administration", or equivalent;
- .4 develop and implement an in-house training programme for improving competence in the implementation of those guidelines; and
- .5 develop and implement a process to identify any requirement left "to the satisfaction of the Administration", or equivalent during the early process of receiving new mandatory IMO instruments or amendments to existing mandatory IMO instruments.

This corrective action will be completed by 16 April 2027.

FD

174 In the case of detention of a ship entitled to fly the flag of the State, the Administration had not overseen that appropriate corrective measures were taken to bring the ship into immediate compliance with the applicable mandatory IMO instruments (III Code, paragraph 25).

Root cause

175 The following factors contributed to this finding:

- .1 follow-up tasks related to the detention of ships flying the flag of the State were not adequately assigned;

- .2 the Administration had not established sufficient resources or processes to effectively manage follow-up actions in the event of such detentions;
- .3 there was an absence of a clearly defined organizational structure within the Administration, including designated personnel with specific functions, tasks, responsibilities, and assignments for managing follow-up actions; and
- .4 the existing procedure for handling follow-up actions after a ship's detention lacked a requirement for systematic monitoring.

Corrective action

176 The relevant entity will ensure that:

- .1 follow-up actions to be taken after a detention are appropriately integrated into the quality management system (QMS);
- .2 sufficient resources are allocated to support the execution of follow-up actions;
- .3 the relevant departments revise existing procedures to ensure the Administration maintains oversight and verifies that all corrective measures are effectively implemented;
- .4 the revised procedure for follow-up clearly identifies the responsible personnel and includes a defined control mechanism;
- .5 the outcomes from detention follow-up actions are utilized to inform the prioritization of future flag State inspections; and
- .6 the effectiveness of the revised follow-up procedure is evaluated periodically.

This corrective action will be completed by 1 December 2024.

FD

177 The oversight programme established by the Administration for monitoring and communicating with its recognized organizations (ROs) had not ensured that its international obligations were fully met (III Code, paragraph 20).

Root cause

178 The following factors contributed to this finding:

- .1 absence of a consistent and sustained mechanism to effectively implement an oversight programme for ROs;
- .2 insufficient human resources with the necessary technical maritime expertise to conduct regular oversight of ROs;
- .3 outdated internal procedures for the supervision and monitoring of ROs; and
- .4 lack of a digital system to periodically assess the performance of ROs, based on the performance of ships entitled to fly the flag of the State.

Corrective action

179 The Administration will implement the following actions:

- .1 develop and implement documented policies within the QMS, clearly defining assigned responsibilities;
- .2 establish a multi-year oversight programme for the monitoring of ROs, including mechanisms to assess the programme's effectiveness;
- .3 allocate adequate resources to support the effective implementation of the oversight programme;
- .4 recruit and/or provide training for a sufficient number of qualified personnel responsible for monitoring ROs; and
- .5 develop and implement procedures and methodologies within the QMS for conducting supplementary surveys of ships.

This corrective action will be completed by 16 April 2026.

FD

180 The Administration had not taken measures to establish and enforce requirements related to fitness for duty and watchkeeping arrangements. This included the prevention of drug and alcohol abuse, as well as fatigue prevention and rest periods (STCW 1978, regulation VIII/2; STCW 1978, regulation VIII/2.2; III Code, paragraph 16.3).

Root cause

181 The following factors contributed to this finding:

- .1 insufficient/limited awareness and resources to develop policies for the implementation of the requirements emanating from the STCW requirements relating to duty and watchkeeping arrangements, including enforcement measures; and
- .2 lack of resources for sufficient qualified personnel.

Corrective action

182 The relevant ministry will undertake the following actions:

- .1 mobilize qualified personnel within the Administration to review existing penal provisions in national legislation and draft amendments to strengthen and modernize the penalty framework;
- .2 update the national legislation to incorporate appropriately severe penalties and formulate policies to support the effective implementation of these requirements;
- .3 empower designated officials within the Administration to exercise control and oversight of the ship registry, ensuring enforcement of the relevant legislative provisions;

- .4 establish and maintain records of all enforcement actions taken and penalties imposed; and
- .5 assign and deploy adequately qualified personnel responsible for the effective implementation and execution of the adopted policies.

This corrective action will be completed by 16 April 2027.

FD

183 The Administration had not established resources and processes capable of administering a safety and environmental protection programme consisting of an independent audit and inspection programme for the entity that issued the required certificates and documentation to ships entitled to fly the flag of the State in order to ensure compliance with the requirements of the applicable mandatory IMO instruments (III Code, paragraph 16.2).

Root cause

184 The following factors contributed to this finding in one of the jurisdictions:

- .1 insufficient/limited awareness and resources to develop a quality management system (QMS) and procedures to establish a safety and environmental protection programme; and
- .2 lack of human and financial resources.

Corrective action

185 The relevant entity will implement the following actions:

- .1 employ and appoint a quality manager in charge of the development, implementation and maintenance of QMS;
- .2 establish a working group to develop an independent audit and inspection programme as part of QMS;
- .3 assign tasks and responsibilities to develop and implement procedures to monitor and review the aforementioned steps for effective implementation; and
- .4 allocate for sufficient financial resources.

This corrective action will be completed by 16 April 2027.

FD

186 The Administration had not implemented an adequate documented system for the qualification of surveyors and continuous updating of their knowledge as appropriate to the tasks they were authorized to undertake (III Code, paragraph 35).

Root cause

187 The following factors contributed to this finding in one of the jurisdictions:

- .1 lack of policy on the qualification of surveyors to address their training needs, as appropriate;
- .2 lack of sufficient resources with technical expertise to set up and maintain a documented system; and
- .3 lack of QMS system that monitors the documented system for the qualification of surveyors.

Corrective action

188 The relevant entities will assign a dedicated person to:

- .1 develop and implement a policy on the qualification of surveyors to address their training needs, as appropriate;
- .2 set up, maintain and update a documented system for the qualification of surveyors; and
- .3 set up and maintain a QMS including monitoring of the documented system.

This corrective action will be completed by 16 April 2027.

FD

189 The Administration had not investigated the very serious marine casualty that occurred on 3 July 2021 on board a ship entitled to fly the flag of the State (SOLAS 1974, regulation I/21; MARPOL, article 12(1); Casualty Investigation Code, paragraph 6.1; III Code, paragraph 41).

Root cause

190 The following factors contributed to this finding in one of the jurisdictions:

- .1 lack of policy and procedures at the State and national level to initiate, execute, publish and report marine accident investigations to the public and IMO;
- .2 national legislation did not ensure impartial and objective investigation in compliance with the Casualty Investigation Code (CIC); and
- .3 lack of organization and sufficient resources within the relevant entity.

Corrective action

191 The relevant entities will undertake the following measures:

- .1 ensure implementation of CIC through updated and promulgated national legislation;
- .2 assign members to the Committee of Investigation to perform the required tasks;

- .3 develop processes, procedures and guidelines to assist investigators in performing their duties;
- .4 recruit independent accident investigators;
- .5 establish a pool/unit comprising of qualified investigators independent from statutory responsibilities, thereby enhancing flexibility and availability for assignments; and
- .6 implement a continuous training programme for the investigators.

This corrective action will be completed by 31 December 2026.

FD

192 Although the Administration was subject to a programme of audits and monitored some aspects of its performance through key performance indicators (KPIs). The performance of the Administration was not evaluated using, inter alia, PSC detention rates, flag State inspection results, casualty statistics, communication and information processes and annual loss statistics excluding constructive total losses (III Code, paragraph 42; III Code, paragraph 43).

Root cause

193 The following factors contributed to this finding :

- .1 lack of awareness of the requirements of the III Code;
- .2 lack of assigned responsibilities for the evaluation of the flag State activities of the State;
- .3 lack of processes, procedures and instructions, including for the selection of KPIs, how to continuously evaluate the flag State activities of the State; and
- .4 lack of sufficient resources.

Corrective action

194 The relevant entities will undertake the following actions:

- .1 enhance awareness on the requirements of the III Code through targeted internal training programmes;
- .2 appoint a dedicated officer within the maritime authority to oversee the evaluation of the flag State activities ;
- .3 establish and maintain a quality management system, including defined processes, procedures, and the selection of KPIs to support the evaluation of flag State performance; and
- .4 allocate the necessary resources and personnel to ensure compliance with the requirements of the III Code.

This corrective action will be completed by 16 April 2026.

FD

195 The Administration did not perform periodic inspections of ships entitled to fly its flag to verify that the actual condition of the ship and its crew was in conformity with the certificates it carried and to ensure compliance with the relevant international (III Code, paragraph 22.2).

Root cause

196 The following factors contributed to this finding:

- .1 the Administration has interpreted national legislation as only requiring flag State inspections for those actively engaged in international voyages. Therefore, if no ships were engaged in such voyages, inspections were deemed unnecessary; and
- .2 the Administration have prioritized the inspection of active ships engaged on international voyages, as these are typically exposed to more significant risks and regulatory scrutiny compared to ships that are inactive or operating domestically.

Corrective action

197 The Administration will implement the following actions:

- .1 review and clarify the requirements set forth in the relevant national legislation. This includes ensuring that the regulations clearly define the conditions under which flag State inspections are required, even if no ships are currently engaged in international voyages;
- .2 conduct inspections on ships temporary not engaged in international voyages to ensure compliance and safety standards are maintained, the Administration will initiate an oversight inspection programme to conduct inspections on ships flying the flag of the State that are temporarily not engaged in international voyages .
- .3 increase monitoring and reporting: implement a more robust system for monitoring and reporting the status and activities of ships flying the flag of the State; and
- .4 allocate sufficient resources for flag State inspection activities to cover the needs of ships flying the flag of the State, regulated under the mandatory IMO instruments.

This corrective action will be completed by 30 June 2026.

FD

198 The existing safety and environmental protection programme, established by the Administration for flag State activities, did not provide for a systematic and timely issuance of:

- .1 administrative instructions to effectively implement the mandatory IMO instruments and their amendments; and

- .2 guidance in relation to all mandatory requirements that are left "to the satisfaction of the Administration", or equivalent.

(SOLAS 1974, regulation I/6; SOLAS 1974, regulation IV/17; SOLAS 1974, regulation XV/3; MARPOL, Annex I, regulation 38.10; LL 1966, annex 1, regulation 19; IP Code, Part III, regulation 2.1.10; III Code, paragraph 16.1; III Code, paragraph 16.5).

Root cause

199 The absence of a dedicated Administration with clear functions assigned for managing provisions related to the mandatory IMO instruments; the absence of a coordinating body among the entities involved in the implementation of the mandatory IMO instruments, and the absence of an exhaustive list of related requirements which could be the basis for developing national instructions or recommendations contributed to this finding.

Corrective action

200 The Administration will compile a comprehensive list of the mandatory IMO instruments requirements that are left "to the satisfaction of the Administration", or equivalent and continuously keep it updated. Use this list as a basis for developing relevant recommendations, if it deems necessary. In addition, the State in cooperation with other interested parties will raise in the relevant IMO body the issue of developing an exhaustive list of provisions in IMO instruments left "to the satisfaction of the Administration", or equivalent, as well as of developing recommendations/clarifications, as appropriate.

This corrective action will be completed by 31 December 2025.

FD

201 There was no evidence to indicate that the Administration had established or participated in an oversight programme with adequate resources for monitoring its recognized organizations (ROs) to ensure that its international obligation was fully met (SOLAS 1974, regulation XI-1/1; RO Code, part 3, section 7.1.1; III Code, paragraph 20).

Root cause

202 The non-periodic monitoring of one of the ROs which was not carried out on time due to the pandemic and subsequent changes in the political landscape, and the absence of relevant procedures to verifying the qualification of personnel responsible for monitoring of ROs contributed to this finding.

Corrective action

203 The Administration will, where appropriate, make greater use of options to recognize the results of periodic oversights of ROs carried out by other States or independent auditors. In addition, it will develop a training programme for personnel responsible for conducting oversights of RO, provide training and create a pool of duly trained specialists. Future oversight programmes of ROs are to be carried out by specialists from this pool. This corrective action will be completed by 31 December 2025.

FD

204 The measures instituted by the Administration were not robust enough to secure observance of international rules and standards by ships entitled to fly its flag or by entities and persons under its jurisdiction. This includes not initiating proceedings after an investigation against ships that violated international standards, regardless of where the violation occurred. Furthermore, the Administration did not ensure appropriate corrective measures were taken when informed that a ship under its flag was detained by a port State authority (III Code, paragraph 22.6; III Code, paragraph 25).

Root cause

205 The appropriate recommendations issued by the respective Ministry in 2018 were not observed regarding the list of actions required by the relevant entity of the Administration, harbour masters and other entities involved in the case of a ship detention, including the development of appeals to the port State and to the respective PSC MoU Secretariat, provision of information to the Ministry, etc.

Corrective action

206 The Administration will reissue recommendations for relevant entities to specify the more effective follow-up actions in case of a flagged ship of the Member State is detained abroad, including corrective measures and proceedings to be taken, in order to bring the detained ship into compliance with the applicable provisions of the mandatory IMO instruments. In addition, the Administration will assign responsibility to a designated official for monitoring the implementation of these recommendations. This corrective action will be completed by 31 December 2025.

OB

207 The Administration did not ensure ready access to expertise, in specific areas, in the conduct of marine safety investigations (III Code, paragraph 39).

Root cause

208 No central database was available within the safety investigation authority's investigation systems map that could compile the contact information of experts consulted by the Commission for its marine inquiries.

Corrective action

209 The safety investigation authority has added a maritime contact database to its investigation systems map. The investigation systems map is the repository for all investigation policy, processes, tools and guidelines. This corrective action will be completed by 31 August 2024.

OB

210 There was no evidence to demonstrate that accidents involving personal injury necessitating absence from duty of three days or more were investigated (III Code, paragraph 40).

Root cause

211 The contributing factor to this observation was the absence of a national policy to investigate accidents under paragraph 40 of the III Code.

Corrective action

212 The State will establish and implement policies/guidance/procedures for investigating any accident involving personal injury, as recommended by paragraph 40 of the III Code. This corrective action will be completed by 30 June 2027.

COASTAL STATE ACTIVITIES**Findings (FD)**

213 The State did not make available the appropriate shore-based facilities for providing radiocommunication services to transmit navigational warnings, danger messages, meteorological and other urgent messages relating to safety of navigation in text other than satellite communication system (SOLAS 1974, regulation IV/5; SOLAS 1974, regulation V/4; SOLAS 1974, regulation V/5; III Code, paragraph 47).

Root cause

214 The system established by the maritime administration for dissemination of marine safety and search and rescue related information was not fully demonstrated to the audit team. A lack of awareness and communication between agencies within the maritime administration led to a fundamental misunderstanding as to whether the State is in fulfilment of its obligations and resulted in the finding.

Corrective action

215 The maritime administration will develop a system to educate the agencies about the communications process on an ongoing basis and ensure there is availability and sharing of information through resources and contact points for agencies. This corrective action will be completed by 31 July 2025.

FD

216 The hydrographic services provided by the State did not undertake to arrange for the preparation and issuance of sailing directions as required by regulation V/9 of SOLAS 1974 (SOLAS 1974, regulation V/9; III Code, paragraph 47).

Root cause

217 There was no specific agreement/procedure between the entities of the maritime administration, port operators and harbour masters to coordinate and communicate data to the charting authority for the maintenance of nautical publications.

Corrective action

218 The concerned entity will engage with port operators, harbour masters, and establish and implement a system with procedures to communicate data pertaining to the coastal and port approaches to the charting authority for the maintenance of nautical publications. This corrective action will be completed by 31 July 2025.

FD

219 The maritime administration had not carried out periodic evaluation and review of its performance in respect to the three ships' routing measures adopted by IMO (SOLAS 1974, regulation V/10; III Code, paragraph 51).

Root cause

220 Multiple stakeholders and agencies have varying degrees of responsibilities in meeting the coastal State obligations under the mandatory IMO instruments. There was a lack of awareness amongst responsible stakeholders and agencies regarding their coastal State obligations, and there were no procedures in place to ensure periodic evaluation and reviews are undertaken of its performance in conducting coastal State activities under the mandatory IMO instruments.

Corrective action

221 The maritime administration will develop a project plan identifying key stakeholders and responsible agencies and resourcing to develop procedures to undertake periodic reviews. The project will then be implemented and the maritime administration will then implement processes to ensure periodic reviews of coastal State obligations are undertaken to evaluate the effectiveness of current systems and identify any gaps and improvements. This corrective action will be completed by 15 June 2026.

FD

222 The maritime administration had not put in place a mechanism for cooperation between national search and rescue (SAR) services, passenger ships regularly calling at ports under the jurisdiction of the State and their companies in developing plans for cooperation in the event of an emergency (SOLAS 1974, regulation V/7.3; III Code, paragraph 47).

Root cause

223 The following factors contributed to this finding:

- .1 lack of clear and uniform understanding of the mandatory requirements for a mechanism for cooperation between national/regional SAR services and passenger ships regularly calling at ports under the jurisdiction of the State;
- .2 lack of coordination and communication amongst various government entities of the State responsible for providing SAR services and services to passenger ships;
- .3 absence of a clear monitoring and evaluation process of drills and real SAR events, including follow-up on lessons learned, communication with SAR entities within the State, as well as the passenger ships and the cruise line companies; and
- .4 lack of clarity and unambiguousness in the actual text and intent of SOLAS 1974, regulation V/7.3 and the III Code, paragraph 47;

Corrective action

224 The maritime administration will implement the following actions:

- .1 develop and implement a policy on a uniform approach on the mechanism for cooperation between national SAR services and passenger ships regularly calling at ports of the State;
- .2 ensure that the responsible entities extend formal arrangements and mutual understandings regarding the applicable requirements, and implement related measures in accordance with SOLAS 1974, regulation V/7.3, and paragraph 47 of the III Code;
- .3 review and enhance the existing mechanisms and documented procedures to identify areas for improvement;
- .4 develop and implement a process for evaluating the effectiveness of SAR plans, including the communication and cooperation among relevant entities involved in SAR operations, as well as procedures for following up on lessons learned; and
- .5 actively contribute to discussions at IMO aimed at clarifying and improving the international understanding and application of SOLAS 1974, regulation V/7.3, and paragraph 47 of the III Code.

This corrective action will be completed by 30 June 2026.

FD

225 The maritime administration did not issue, by terrestrial and space radiocommunication services, appropriate weather and wave forecasts information suitable for shipping (SOLAS 1974, regulation V/5; III Code, paragraph 47).

Root cause

226 The following factors contributed to this finding:

- .1 lack of comprehensive planning and insufficient communication during the reorganization of the maritime sector; and
- .2 lack of defined responsibilities following the reorganization of the maritime sector.

Corrective action

227 The maritime administration will implement the following actions:

- .1 conduct a comprehensive review of the responsibilities of the entities comprising the maritime administration to identify any unassigned or overlapping responsibilities and assign all the responsibilities emanating from the mandatory IMO instruments;
- .2 develop a structured transition plan that includes detailed steps for reallocating responsibilities during reorganization processes;

- .3 request technical assistance from IMO and other partners on shore-based facilities in the maritime mobile service and the maritime mobile-satellite service;
- .4 conduct targeted training for all staff involved in the reorganization process to enhance communication among the entities comprising the maritime administration; and
- .5 conduct regular workshops or briefings to address any confusion or gaps in understanding new duties.

This corrective action will be completed by 31 December 2026.

FD

228 The maritime administration lacked a structured mechanism to address shortcomings identified during regular evaluations of its capabilities in fulfilling obligations as a coastal State under the mandatory IMO instruments (III Code, paragraph 51).

Root cause

229 The following factors contributed to this finding:

- .1 insufficient empowerment of the entity responsible for overseeing the effective implementation of corrective actions;
- .2 limited financial, technical, and human resources to develop, maintain, and implement a structured mechanism;
- .3 there was a lack of appropriate prioritization of the importance of addressing shortcomings; and
- .4 there was insufficient awareness of the need to establish a structured mechanism to address and monitor the identified shortcomings systematically.

Corrective action

230 The maritime administration will implement the following actions:

- .1 enhance the authority and mandate of the existing centralized task force by revising the existing legislation and, in particular, its authority to ensure that corrective actions are effectively implemented across all relevant agencies;
- .2 provide the centralized task force with adequate financial, technical, and human resources to develop, maintain, and implement a structured mechanism ensuring that corrective actions are effectively implemented;
- .3 implement training programmes to inform relevant personnel about the importance of establishing a structured, systematic mechanism to address, monitor, and prioritize identified shortcomings;

- .4 implement training programmes to enhance the knowledge and skills of personnel responsible for maritime safety and compliance, ensuring they are well-equipped to address shortcomings identified in evaluations; and
- .5 develop and implement a structured, continuous monitoring procedure that evaluates the performance of the State in respect of meeting its obligations under the relevant mandatory IMO instruments.

This corrective action will be completed by 31 December 2026.

FD

231 There was no evidence that the maritime administration had reviewed existing ship reporting system adopted by IMO in line with the guidelines and criteria developed by the Organization (SOLAS 1974, regulation V/11; III Code, paragraph 47).

Root cause

232 Absence of a procedure on the level of the relevant entity of the maritime administration to carry out reviews of the ship reporting system adopted by IMO (SAR area of the State) in line with the guidelines and criteria developed by IMO.

Corrective action

233 The maritime administration will assign responsibility to a designated official for monitoring the management of the mandatory ship reporting system in the relevant Sea. In addition, a procedure will be established for reviewing the ship reporting system and the State will annually submit the information on this review for the relevant SAR area of the State, prepared in format approved by IMO. This corrective action will be completed by 31 December 2025.

FD

234 Although the maritime administration had developed and adopted a national oil spill contingency plan provisions to respond to pollution involving dangerous goods and noxious liquid substances (NLS), as well as policies on the use of dispersants in respect of NLS pollution had not been established (MARPOL, Annex II, regulation 3.1.3; III Code, paragraph 50.2).

Root cause

235 The fact that detailed responsibilities of the entities in charge to respond to pollution involving dangerous goods and NLS were not established; and the absence of procedures to respond to pollution involving dangerous goods and NLS and on the use of dispersants, contributed to this finding.

Corrective action

236 The maritime administration will establish responsibilities of the relevant entities on the organization of work on the prevention and elimination of pollution by dangerous goods and NLS. In addition, it will establish a procedure and implement a mechanism for timely response to incidents involving dangerous goods and NLS, as well as on the use of dispersants. This corrective action will be completed by 31 December 2025.

PORT STATE ACTIVITIES

Findings (FD)

237 The entity responsible for the reception facilities had not carried out an analysis of the adequacy and capacity of the existing reception facilities, as well as for the evaluation of their performance under the requirements of MARPOL Annexes I, II, IV and V. Furthermore, although the State was a party to MARPOL Annex VI, no adequate or equivalent reception facilities had been provided for the purpose of ensuring collection, transport, treatment and disposal under that Annex (MARPOL, Annex I, regulation 38.1; MARPOL, Annex II, regulation 18.1; MARPOL, Annex IV, regulation 12.1; MARPOL, Annex V, regulation 8.1; MARPOL, Annex VI, regulation 17.1; III Code, paragraph 55; III Code, paragraph 56.1).

Root cause

238 There was a lack of awareness of the obligation to conduct an analysis of the adequacy and capacity of port reception facilities. In addition, it had not been clearly specified in national legislation, nor in the concession to service providers regarding the removal of ship generated waste under MARPOL Annex VI.

Corrective action

239 The responsible entities of the maritime administration will implement the following actions:

- .1 the technical entity of the maritime administration responsible for managing the authorization of external service providers for ship-generated waste removal services in ports, will carry out an analysis of the adequacy of the reception facilities and their capacity based on the type of ships that call at ports of the State and the type of waste generated in accordance with the MARPOL annexes;
- .2 the technical entity of the maritime administration will promote and develop measures within the maritime-port industry, to manage the removal of ship generated waste under MARPOL, Annex VI by existing external service providers, ensuring that they have the capacity to fulfil the task;
- .3 existing national legislation/procedures on the matter will be reviewed and amended accordingly, and
- .4 new national legislation, as appropriate, will be developed and implemented accordingly.

This corrective action will be completed by 31 July 2025.

FD

240 The maritime administration had not implemented some requirements of the IMDG Code and the International Code for the Safe Carriage of Grain in Bulk, in particular:

- .1 the latest amendments to the IMDG Code had not been implemented;
- .2 no management system had been established for the handling of Class 7 dangerous goods;

- .3 no policies had been established for maintaining training records for shore personnel involved in any aspect with dangerous goods; and
- .4 no procedures were in place to ensure ship stability criteria prior to bulk grain loading

(SOLAS 1974, regulation VII/3; IMDG Code, section 1.3.1; IMDG Code, section 1.5.3; Grain Code, paragraph 7.2; ILL Code, paragraph 54; ILL Code, paragraph 55).

Root cause

241 The following factors contributed to this finding:

- .1 prolonged and complex legal process and lack of coordination between the different entities involved in processing amendments to ensure their adoption in a timely manner;
- .2 lack of coordination between the different entities involved in handling of dangerous goods class 7;
- .3 lack of knowledge of the main technical responsible entity dealing with dangerous goods regarding requirements of the IMDG Code, on the training of shore-based personnel and the treatment of related generated records; and
- .4 lack of knowledge of the main technical responsible entity dealing with the International Grain Code related to stability requirements of a ship before leaving the port.

Corrective action

242 The responsible entities of the maritime administration will implement the following actions:

- .1 once the new amendment adoption process is approved, the amendments to the IMDG Code will be transposed into national legislation and implemented. In addition, a monitoring and control mechanism will be established for the processing of pending amendments regarding this Code;
- .2 establish a working group with the participation of responsible entities and the maritime authority to implement the requirements of the IMDG Code, on establishing a management system for the handling of dangerous goods class 7, and to establish coordination measures to deal with related matters in the future;
- .3 the respective division of the maritime authority will prepare a maritime circular to regulate matters regarding the required training of shore-based personnel handling dangerous goods and related record-keeping, according to the requirements of the IMDG Code;
- .4 the respective division of the maritime authority will prepare a maritime circular to regulate issues related to requirements and obligations under the International Grain Code. In addition, an auditing programme will be established to ensure compliance of the international regulations of these matters;

- .5 a technical review board will be established, composed of the involved ministries and the maritime authority, to analyse the obstacles in the process of processing and adopting amendments to the mandatory IMO instruments, and to propose a work plan aiming to implement measures to reduce amendments' processing time;
- .6 as the maritime administration does not have powers or authority to change the complex legal process, the appropriate authorities will be informed of this issue; and
- .7 in-house training will be delivered for technical personnel regarding the new arrangements for regulating and enforcing the IMDG Code and the International Grain Code.

This corrective action will be completed by 31 December 2025.

FD

243 The maritime administration had not implemented a system of periodic evaluation of the performance of its port State activities that included all port activities for the purpose of verifying compliance with its obligations under the mandatory IMO instruments to which the State was a Party (III Code, paragraph 63).

Root cause

244 The lack of awareness regarding the scope of the III Code regarding the evaluation of performance in the port State control (PSC) areas contributed to this finding.

Corrective action

245 The responsible entities of the maritime administration will implement the following actions:

- .1 the maritime authority will update the permanent policies on PSC activities include all the involved activities within this area;
- .2 each of the entities of the State with port State obligations and responsibilities will develop and implement a periodic performance evaluation system which will include clear objectives and key performance indicators in order to verify compliance with the applicable mandatory IMO instruments; and
- .3 in-house training will be delivered for officers managing port State activities with regard to III Code provisions in the area of evaluation and review.

This corrective action will be completed by 31 December 2025.

FD

246 The maritime administration had not taken the necessary measures to implement and enforce the IMDG Code at the federal States level, in matters related to:

- .1 identifying and establishing the role of the competent authority for matters relating to the carriage of dangerous goods;

- .2 mechanisms in place to manage the handling of class 7 dangerous goods (radioactive); and
- .3 establishing training programmes for the offshore-based personnel involved in the handling of dangerous goods and record keeping of said training

(SOLAS 1974, regulation VII/3; IMDG Code, section 1.3.1; IMDG Code, section 1.5.2; IMDG Code, section 1.5.3; III Code, paragraph 55).

Root cause

247 The following factors contributed to this finding:

- .1 in the State the responsibilities for monitoring the transport of dangerous goods were assigned to various authorities on the federal and State levels. Due to the complexity of the federal regulatory structure, the applicable provisions, and thus the competent authorities, were not clearly appointed under the "contact points" module on GISIS. In many of the ports of the federal State the roles of the competent authorities for matters relating to the transport of dangerous goods were defined and determined by the relevant Acts, Ordinances, and Agreements, as well as by relevant State national legislation;
- .2 requirements dealing with radiation protection programmes and management systems, were not adequately documented, as there were no uniform guidelines or internal administrative regulations and forms for documenting the inspections in the different ports of the State where dangerous goods class 7 were handled; and
- .3 in some ports of the State, requirements related to the training of shore-based personnel involved in the handling of dangerous goods, and record keeping of such training, were not sufficiently documented, as there were no uniform guidelines or internal administrative regulations and forms.

Corrective action

248 The responsible entities of the maritime administration will implement the following actions:

- .1 in those ports of the State where applicable, the State's legislation will be reviewed and adapted in order to identify and establish the role of the competent authorities for matters relating to the carriage of dangerous goods;
- .2 in those ports of the State where applicable, adequate documentation of supervision of a radiation protection programme and management systems will be ensured by revising and possibly amending or implementing relevant State administrative orders; and
- .3 in those ports of the States where applicable, adequate documentation of the supervision regarding the establishment of training programmes and record keeping for shore-based personnel engaged in the handling of dangerous goods will be ensured by revising and possibly amending or implementing relevant State administrative orders.

This corrective action will be completed by 1 July 2026.

FD

249 Although the State was a Party to MARPOL 73/78, it could not be demonstrated that the port reception facilities available were adequate to accept all types of wastes generated from ships (MARPOL, Annex I, regulation 38.1; MARPOL, Annex II, regulation 18.1; MARPOL, Annex II, regulation 18.2; MARPOL, Annex V, regulation 8.1; III Code, paragraph 55; III Code, paragraph 56.1).

Root cause

250 Inadequate resourcing and a lack of prioritization of developing and implementing operational policy resulted in the maritime administration's failure to develop the necessary operational policies and practice in relation to the use of rules requiring port reception facilities to be provided under MARPOL 73/78 and other mandatory IMO instruments.

Corrective action

251 The maritime administration has established a dedicated operational policy team and is developing a range of new policy frameworks and work programmes to build its capability around operational policy and practice, as part of the maritime administration's evolving organizational strategy. This will include reviewing and developing operational policies related to port State obligations, including those identified in this finding, and ensuring their implementation. In addition, the maritime administration has established a new maritime inspection team with a dedicated and ongoing focus on port State obligations. The maritime administration will develop operational practices, processes and systems to ensure that the work of the new team reflects and gives full effect to port State obligations, including those identified in this finding. These arrangements will have in-built quality assurance and reporting elements as part of the operational policy and practice framework. This corrective action will be completed by 31 July 2026.

FD

252 The requirements of SOLAS 1974 in respect of verified gross mass (VGM) of containers carried on board ships had not been enforced. The maritime administration did not have a control and monitoring mechanism that ensured shippers weighed containers before transporting them to the port (SOLAS 1974, regulation VI/2.4; III Code, paragraph 57).

Root cause

253 A lack of focused resourcing on port State obligations led to a failure to take a systematized and comprehensive oversight approach on the port State responsibilities, including a failure to develop operational policy and assurance processes with respect to VGM requirements.

Corrective action

254 The maritime administration has established a dedicated operational policy team and is developing a range of new policy frameworks and work programmes to build capability in relation to operational policy and practice, as part of the evolving organizational strategy. This will include developing a control and monitoring mechanism to ensure that shippers weigh containers before transporting them to port. The maritime administration will then ensure that the newly established maritime inspection team implements this mechanism, as part of a dedicated and ongoing focus on port State responsibilities. This corrective action will be completed by 31 July 2026.

FD

255 The existing system of periodic evaluation of performance in the conduct of port State activities did not include aspects related to provision of reception facilities and implementation of verified gross mass (VGM) containers (III Code, paragraph 63).

Root cause

256 A lack of focused resourcing on port State obligations led to a failure to take a systematized and comprehensive oversight approach on the port State obligations, including a failure to develop a system to periodically evaluate the performance of the port State obligations under the mandatory IMO instruments, including those in respect of port reception facilities and VGM requirements.

Corrective action

257 The maritime administration has established a dedicated operational policy team and is developing a range of new policy frameworks and work programmes to build its capability in relation to operational policy and practice, as part of the evolving organizational strategy. This will include developing a system to ensure the periodic evaluation and monitoring of the implementation of all port State obligations under the mandatory IMO instruments, including those identified in this finding. This corrective action will be completed by 31 July 2026.

FD

258 Although there was evidence of a system in place to ensure compliance with the requirements of the IMDG and IMSBC Codes, there was no objective evidence to demonstrate that:

- .1 latest amendments to the IMDG Code had been implemented;
- .2 the existing radiation protection programme, for handling of class 7 goods, had been implemented;
- .3 the system for training shore-based personnel involved in the handling of dangerous goods had been fully implemented according to the requirements of the IMDG Code; and
- .4 guidance and procedures for handling of those cargoes not listed in appendix 1 to the IMSBC Code had been established and implemented

(SOLAS 1974, regulation VII/3; SOLAS 1974, regulation VII/7-5; MARPOL, Annex II, regulation 6.3; IMDG Code, section 1.3.1; IMDG Code, section 1.5.3; IMSBC Code, paragraph 1.3; III Code, paragraph 54.1).

Root cause

259 The following factors contributed to this finding:

- .1 lack of coordination and a mechanism for cooperation among the various entities involved in the management of dangerous goods; and
- .2 lack of sufficient policies, technical and administrative instructions to regulate the handling of dangerous goods in accordance with the IMDG Code.

Corrective action

260 The maritime administration will implement the following actions:

- .1 revise the existing regulations, and develop a mechanism to implement latest amendments to IMDG Code and IMSBC Code;
- .2 establish a mechanism to ensure the effective coordination and cooperation among entities involved in managing dangerous goods. In this context, national legislation will be amended, and policies and technical and administrative instructions will be developed and implemented, to ensure compliance with requirements related to the handling of dangerous goods; and, in particular, the radiation protection programme for handling of class 7 dangerous goods will be fully implemented;
- .3 review the mechanisms set out in the overall maritime strategy to ensure the effective coordination among entities of the State in this regard;
- .4 ensure the full implementation of the system for the training of shore-based personnel involved in the handling of dangerous goods, according to the IMDG Code requirements; and
- .5 the Administration will review its quality management system's procedures to update them and bring them into line with the requirements of the IMDG Code and the IMSBC Code, including developing and implementing arrangements/provisions/instructions for handling of those cargoes not listed in appendix 1 to the IMSBC Code.

This corrective action will be completed by 1 July 2025.

FD

261 The maritime administration had not fully implemented policies through issuing national legislation and guidance in order to assist the State in fulfilling its obligations as a port State. Specifically, legislation and policies had not been developed to regulate fuel oil supply to ships calling the ports in the State, verification of gross mass of containers and provision of port reception facilities (MARPOL, Annex I, regulation 38.1; MARPOL, Annex II, regulation 18.1; MARPOL, Annex IV, regulation 12.1; MARPOL, Annex V, regulation 8.1; MARPOL, Annex VI, regulation 17.1; MARPOL, Annex VI, regulation 18.9; III Code, paragraph 54.1; III Code, paragraph 55; III Code, paragraph 56.1; III Code, paragraph 56.3).

Root cause

262 The following factors contributed to this finding:

- .1 responsibilities among the various entities of the maritime administration are not clearly defined;
- .2 lack of adequate training to personnel to assist in the transposition of the mandatory IMO instruments and their amendments related to port State obligations into domestic maritime legislation; and
- .3 lack of coordination among the maritime entities responsible for implementing port State obligations.

Corrective action

263 The maritime administration will implement the following actions:

- .1 define/document the responsibilities among the various entities of the maritime administration through the maritime strategy and the steering committee;
- .2 provide training in maritime law to personnel in the maritime administration (e.g. for legal advisers and the officers and other maritime agencies) to enhance the maritime legal expertise of personnel;
- .3 establish a dedicated division/unit to oversee the coordination, management and review of matters related to the mandatory IMO instruments, including the development of policies and guidance to assist their implementation;
- .4 revise the fuel oil supply regulations to review marine and bunkering activities in these regulations and to align them with the requirements adopted by IMO in relevant national maritime legislation;
- .5 establish and implement procedures for the implementation and monitoring of fuel oil suppliers, verified gross mass of containers and port reception facilities (PRF); and
- .6 form a PRF Committee at the national level to serve as a platform for coordinating relevant agencies, and developing policies and guidelines related to PRF.

This corrective action will be completed by 30 June 2027.

FD

264 The maritime administration did not adequately evaluate its performance periodically with respect to exercising its rights and meeting its port State obligations (MARPOL, Annex VI, regulation 18.9; III Code, paragraph 63).

Root cause

265 The following factors contributed to this finding:

- .1 lack of procedures and mechanisms for the periodic evaluation and review of performance as a port State; and
- .2 no dedicated unit has been assigned to monitor, review and analyse the performance and effectiveness of the implemented policies.

Corrective action

266 The maritime administration will implement the following actions:

- .1 establish and implement a procedure for the periodic assessment and review of the performance in the conduct of port State activities; and

- .2 establish a dedicated division/unit to oversee the coordination and management of matters related to the mandatory IMO instruments, and to periodically evaluate and review the performance in the conduct of port State activities.

This corrective action will be completed by 30 June 2027.

FD

267 The maritime administration had no adequate legislation, guidance or procedures in place to ensure implementation of the IMDG, IMSBC and Grain Codes and the applicable provisions of MARPOL 73/78 concerning the provision of adequate port reception facilities. In particular, there was no evidence that the maritime administration:

- .1 designated competent authority for matters related to handling of dangerous goods;
- .2 ensured that periodical training was conducted and the period of time for keeping records of training of shore-based personnel involved in handling of dangerous goods was established;
- .3 implemented detailed instructions on emergency response and emergency medical care required in an event involving dangerous goods;
- .4 ensured the implementation of loading and unloading requirements in accordance with SOLAS 1974, chapter VI, and in compliance with the relevant provisions of the IMSBC Code;
- .5 ensured that ships without document of the authorization would not load grain until the relevant provisions of regulation 3 of the Grain Code were satisfied (SOLAS 1974, regulation VII/3; IMDG Code, section 1.3.1; IMSBC Code, paragraph 4.3.3; Grain Code, paragraph 3.5; ILL Code, paragraph 54; ILL Code, paragraph 55).

Root cause

268 The following factors contributed to this finding:

- .1 the absence of subsidiary national legislation, procedures and guidelines related to establishment and functioning of port reception facilities in accordance with MARPOL;
- .2 lack of awareness and expertise of the applicable mandatory IMO instruments related to handling of dangerous goods;
- .3 lack of national legislation incorporating mandatory IMO requirements related to handling of cargoes regulated under the IMDG, IMSBC and the International Grain Codes; and
- .4 absence of assigned responsibilities and a mechanism for cooperation among the various entities involved in the management of dangerous goods.

Corrective action

269 The responsible entities of the maritime administration will implement the following actions:

- .1 the respective Ministries will develop and implement national legislation related to establishment and functioning of port reception facilities in accordance with MARPOL Annexes I, II, IV and V, taking into account division of responsibilities between the various involved entities;
- .2 the respective Ministries will develop and implement national legislation incorporating mandatory IMO requirements related to handling of cargoes regulated under the IMDG, IMSBC and the International Grain Codes;
- .3 the respective Ministries will develop and implement procedures and guidelines, as appropriate, concerning the IMDG Code, including training of shore-based personnel, emergency response and emergency medical care required in an event involving dangerous goods; the IMSBC Code and the International Grain Code;
- .4 the responsible entities will be identified and coordinated in developing national legislation concerning dangerous goods through which the responsibilities of each competent authority will be specified. Additionally the competent authorities will establish a mechanism for cooperation in the management of dangerous goods; and
- .5 external expertise will be sought for assisting in awareness-raising and legislation-drafting process.

This corrective action will be completed by 30 December 2026.

FD

270 The maritime administration did not periodically evaluate its performance in respect of meeting port State obligations under the mandatory IMO instruments (III Code, paragraph 63).

Root cause

271 The following factors contributed to this finding:

- .1 lack of awareness of the requirements of the III Code; and
- .2 lack of assigned responsibilities among relevant entities of the State to perform a periodic evaluation of performance as a port State in respect of port reception facilities.

Corrective action

272 The responsible entities of the maritime administration will implement the following actions:

- .1 identify the responsible entities and establish and implement a documented system for periodically reviewing and evaluating the implementation and enforcement of relevant requirements of the mandatory IMO instruments related to port State activities, including data on port reception facilities; and
- .2 carry out a training and awareness programme, concerning the requirements for port activities of the State, for the involved personnel.

This corrective action will be completed by 30 April 2026.

FD

273 The maritime administration did not ensure that adequate port reception facilities are provided in the port of the State for ship generated waste regulated under MARPOL 73/78, Annexes I, II, IV and V (MARPOL, Annex I, regulation 38.1; MARPOL, Annex II, regulation 18.1; MARPOL, Annex IV, regulation 12.1; MARPOL, Annex V, regulation 8.1; III Code, paragraph 56.1).

Root cause

The following factors contributed to this finding:

- .1 lack of understanding of the obligations under MARPOL in relation to the provision of port reception facilities;
- .2 absence of national legislation, procedures and detailed instructions to cover the requirements stemming from the applicable mandatory IMO instruments regarding port reception facilities and related guidelines, including an assessment of available facilities and quantities as well as types of waste received; and
- .3 lack of continuous monitoring of the activities of port service providers to verify compliance with the requirements of MARPOL on reception of waste from ships.

Corrective action

274 The responsible entities of the maritime administration will implement the following actions:

- .1 develop and implement national legislation and documented procedures and instructions on port reception facilities, considering assignment of responsibilities amongst entities involved;
- .2 establish a documented monitoring and on-site verification system concerning the operation of port reception facilities; and
- .3 carry out a training and awareness programme, concerning the obligations under MARPOL in relation to the provision of port reception facilities, for the involved personnel.

This corrective action will be completed by 30 April 2026.

FD

275 The maritime administration authorized some companies to collect and treat ship-generated waste regulated under MARPOL 73/78, Annexes I, IV and V. However, the government entity responsible for enforcing relevant national legislation was not systematically monitoring those companies conducting activities to ensure they were in line with MARPOL 73/78, Annexes I and V (MARPOL, Annex I, regulation 38.1; MARPOL, Annex IV, regulation 12.1; MARPOL, Annex V, regulation 8.1; III Code, paragraph 57).

Root cause

276 The following factors contributed to this finding:

- .1 lack of established procedures related to monitoring of functioning of port reception facilities; and
- .2 lack of human resources to rigorously monitor observance of regulations related to functioning of reception facilities.

Corrective action

277 The responsible entity of the maritime administration will implement the following actions:

- .1 develop implement and review a documented monitoring and on-site verification procedure to ensure observance of regulations related to functioning of reception facilities; and
- .2 recruit and train qualified personnel to monitor observance of regulations related to functioning of reception facilities.

This corrective action will be completed by 30 April 2026.

FD

278 The maritime administration had not:

- .1 implemented and enforced the national legislation concerning the provision of port reception facilities in accordance with the applicable provisions of MARPOL Annexes I, II, IV, and V;
- .2 systematically authorized and monitored the companies providing services as per the relevant MARPOL requirements;
- .3 implemented the provisions of the IMDG Code, as amended, as well as emergency response and emergency medical care requirements through appropriate national legislation; and
- .4 implemented policies and procedures concerning PSC inspections

(MARPOL, Annex I, regulation 38.1; MARPOL, Annex II, regulation 18.1; MARPOL, Annex IV, regulation 12.1; MARPOL, Annex V, regulation 8.1; III Code, paragraph 54.1; III Code, paragraph 56.1).

Root cause

279 The following factors contributed to this finding:

- .1 lack of clarity concerning the responsibilities of the respective ministries;
- .2 absence of sufficient legal framework for MARPOL, Annexes I, II, III, IV and V;
- .3 lack of policy for MARPOL, Annexes I, II, III, IV and V;
- .4 lack of procedures concerning the implementation of MARPOL Annexes I, II, III, IV and V;
- .5 lack of sufficient supervision concerning the implementation of MARPOL Annexes I, II, III, IV and V; and
- .6 no assessment of overall responsibility for monitoring the adequacy of the port reception facilities.

Corrective action

280 The maritime administration will implement the following actions:

- .1 establish clear lines of communication and make agreements between the entities involved to specify the responsibilities of each entity concerning the implementation of MARPOL Annexes I, II, III, IV and V;
- .2 develop and promulgate the necessary legal framework for implementing MARPOL Annexes I, II, III, IV and V;
- .3 develop and implement appropriate policies for implementing MARPOL Annexes I, II, III, IV and V;
- .4 develop and implement procedures on the implementation of MARPOL Annexes I, II, III, IV and V;
- .5 appoint and equip an organization responsible for the enforcement of MARPOL Annexes I, II, III, IV and V; and
- .6 specify the ports where port reception facilities are available and will be available.

This corrective action will be completed by 30 June 2026.

FD

281 The maritime administration did not:

- .1 provide appropriate reception facilities or equivalent arrangements for the reception of ship-generated wastes regulated under MARPOL Annex VI; and
- .2 keep a register of fuel oil suppliers

(MARPOL Annex VI, regulation 17.1; MARPOL Annex VI, regulation 18.9; III Code, paragraph 56.1; III Code, paragraph 56.3).

Root cause

282 The following factors contributed to this finding:

- .1 insufficient clarity of the requirements related to the plan for the reception and management of waste from ships concerning wastes generated under MARPOL Annex VI; and
- .2 lack of clarity regarding the responsibilities of various institutions involved in the requirements for authorization of fuel oil suppliers stemming from multiple changes in national legislation.

Corrective action

283 The maritime administration will implement the following actions:

- .1 conduct an information campaign to clarify the requirements of the plan for the reception and management of waste from ships concerning wastes generated under MARPOL Annex VI;
- .2 amend the national legislation to clarify the responsibilities of various entities involved in regulating fuel oil suppliers; and
- .3 develop, implement, and evaluate organizational and procedural measures to monitor the fuel oil suppliers.

This corrective action will be completed by 30 June 2026.

FD

284 The maritime administration did not ensure that:

- .1 shore-based personnel handling dangerous goods in port areas was trained in the contents of dangerous goods provisions commensurate with their responsibilities before assuming responsibilities;
- .2 local suppliers provided the bunker delivery notes and sample as required by MARPOL Annex VI, regulation 18; and
- .3 local suppliers retained a copy of the bunker delivery note for at least three years for inspection and verification by the port State as necessary

(SOLAS 1974, regulation VII/3; MARPOL Annex VI, regulation 18.9; IMDG Code, section 1.3.1; ILL Code, paragraph 57).

Root cause

285 The following factors contributed to this finding:

- .1 insufficient resources for overseeing the training of shore-based personnel handling dangerous goods in port areas;
- .2 inadequate training infrastructure for the training of shore-based personnel handling dangerous goods in port areas;

- .3 insufficient procedures for overseeing the implementation and enforcement of mandatory provisions concerning the bunker delivery notes; and
- .4 misinterpretation of the allocation of responsibilities deriving from the requirements of MARPOL Annex VI.

Corrective action

286 The maritime administration will implement the following actions:

- .1 allocate sufficient resources for overseeing the training of shore-based personnel handling dangerous goods in port areas;
- .2 provide adequate training facilities for the training of shore-based personnel handling dangerous goods in port areas;
- .3 develop, implement and evaluate a documented procedure for overseeing and enforcing the mandatory provisions concerning the training of all personnel involved in handling and management of dangerous goods in port areas;
- .4 establish a coordination mechanism between port authorities and port operators engaged in handling the transportation and storage of dangerous goods under the IMDG Code;
- .5 clarify the responsibilities of the various entities involved in the implementation and enforcement of the provisions emanating from MARPOL Annex VI and inform the entities involved; and
- .6 develop, implement, and evaluate procedures for overseeing the implementation and enforcement of mandatory provisions concerning the bunker delivery notes.

This corrective action will be completed by 30 June 2026.

FD

287 The maritime administration did not sufficiently establish the necessary policies, through national legislation, administrative instructions, or documented procedures, to ensure:

- .1 the effective implementation of the IMDG Code;
- .2 the effective implementation of the IMSBC Code;
- .3 the verification of compliance by ships carrying cargo regulated under the International Grain Code; and
- .4 the establishment of a Tripartite Agreement, where applicable

(SOLAS 1974, regulation VII/2.4; SOLAS 1974, regulation VII/7-1; SOLAS 1974, regulation VII/7-2.2; IMDG Code, section 1.3.1; IMDG Code, section 1.5.2; IMDG Code, section 1.5.3; IMDG Code, chapter 3.3, SP976; IMSBC Code, paragraph 1.3; Grain Code, paragraph 3.5; IGC Code, paragraph 1.1.6.1; III Code, paragraph 54; III Code, paragraph 55).

Root cause

288 The lack of coordination among the relevant entities responsible for implementing the IMDG, IMSBC, IGC and the Grain Codes in the State; and the absence/lack of regulatory framework for certain aspects related to carriage of dangerous goods, liquified gas, grain and other bulk cargoes, including tripartite agreements, contributed to this finding.

Corrective action

289 The maritime administration will establish a coordination body for cooperation with IMO comprising representatives of the relevant port State entities, primarily those involved in the implementation of the mandatory IMO instruments in the State. Once established, the coordination body will develop and implement a new, and/or improve the existing regulatory legal acts related to the carriage of dangerous goods, liquified gas, grain and bulk cargoes. This corrective action will be completed by 31 December 2027.

AREAS OF POSITIVE DEVELOPMENT**Best practices**

290 The Member State had implemented a qualification system for the flag State inspectors and PSCOs which permitted these qualifications to be kept updated at all times.

291 The Hydrographic and Oceanographic Service had internally developed and implemented an alert system that permitted a permanent monitoring.

292 The State had developed a "Maritime Operator Safety System" as a comprehensive regulatory and compliance system for safe, secure and clean operation of domestic commercial non-convention ships;

293 One notable initiative of the State was the introduction of a consolidated programme aimed at simplifying the regulatory framework to create a more efficient expedient system to give effect to the mandatory IMO instruments; and

294 The State had an overall system of requiring annual "Statement of Performance of Expectation" from each ministry and agency that contained implementation responsibilities under relevant mandatory IMO instruments. Said system facilitated the culture of continual improvement.

295 The implemented system in place for communicating and reporting to IMO under requirements stemming from mandatory IMO instruments ensured timely and effective communication.

296 The Member State developed a comprehensive maritime strategy for giving full and complete effect to the mandatory IMO instruments through the effective and efficient cooperation of all relevant entities and Administrations. The maritime strategy was developed through a coordinating body comprised of representatives of the relevant entities and Administrations. The organization, method of work and governance of the above coordinating body were specified in a Cooperation Protocol, which was approved and signed by the relevant ministers and published in the official gazette. The objectives of the maritime strategy were linked to clear and concise key performance indicators (KPIs) recorded in a multi-annual plan. The coordinating body was responsible for the implementation of the strategy as well as monitoring and reporting to the responsible ministers in accordance with the agreed Protocol.