



MINISTRY OF FOREIGN AFFAIRS AND INTERNATIONAL COOPERATION



Embassy of Italy in London

Permanent Representation to the International Maritime
Organization, the IOPC FUNDS and the IMSO

Annual Report 2025

Permanent Representation to the International
Maritime Organization (IMO), the International
Oil Pollution Compensation (IOPC) Funds, and
the International Mobile Satellite Organization
(IMSO)

Second Annual Report
2025

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Summary

<i>Foreword by the Deputy Minister of Infrastructure and Transport</i>	9
<i>Foreword by the Italian Permanent Representative to the IMO, the IOPC Funds and the IMSO</i>	11
CHAPTER I	14
<i>The Role of the Italian Permanent Representation to the IMO</i>	14
1. Notes on the IMO	14
1.1 <i>The IMO Convention</i>	14
1.2 <i>Focusing on Safety</i>	14
1.3 <i>Protection of the marine environment</i>	15
1.4 <i>Satellite-based emergency and safety communications</i>	15
1.5 <i>Safety management and training</i>	15
1.6 <i>Maritime Security</i>	15
1.7 <i>Capacity Building</i>	16
1.8 <i>Tackling the climate crisis</i>	16
2. Italy's role in the Council.	16
2.1 <i>134th session of the IMO Council</i>	17
2.2 <i>Council 135, Assembly 34 and Council 136</i>	18
3. IMO Hot topics	19
4. Strengthening Italy's presence in the IMO	20
4.1 <i>The activities of the Maritime Office</i>	20
4.2 <i>Training opportunities at IMLI</i>	22
CHAPTER II	24
<i>Activity in IMO Committees and Subcommittees</i>	24
1. Italy's contribution to the Marine Environmental Protection Committee (MEPC 83)	24
1.1 <i>Outcome of the extraordinary meeting of the Marine Environment Protection Committee (MEPC 83 ES 2)</i>	26
1.2 <i>The work of the PPR Subcommittee</i>	27
2 The work of the Committee on the London Convention and the London Protocol	29
3. Italy's role in the Maritime Safety Committee (MSC)	29
3.1 <i>The work of the SDC Subcommittee</i>	31
3.2 <i>The work of the HTW Subcommittee</i>	32
3.3 <i>The work of the SSE Subcommittee</i>	33
3.4 <i>The work of the NCSR Subcommittee</i>	35
3.5 <i>The work of Subcommittee III</i>	37
3.6 <i>The work of the CCC Subcommittee</i>	39
4. The simplification process in the maritime sector carried out within the FAL Committee	40
5. Technical cooperation (TC).	41
6. The legal aspects addressed within the Legal Committee (LEG).	42

<i>7. In-depth analyses</i>	44
<i>7.1 In-depth analysis – The new IMO-ILO Guidelines for the Protection of Detained Seafarers and the IMO's Priorities: Towards Fair Treatment and the Fight against Substandard Shipping</i>	44
<i>7.2. In-depth analysis – Underwater Radiated Noise (URN) – an invisible emergency in the oceans</i>	45
CHAPTER III	49
<i>The Italian Permanent Representation in the IOPC FUNDS and in the IMSO</i>	49
<i>1.The Italian contribution to the IOPC FUNDS activity</i>	49
<i>2.The main measures adopted by the IOPC FUNDS in 2025</i>	49
<i>3.Italy's participation in the work of IMSO</i>	52
CHAPTER IV	55
<i>Concluding observations</i>	55
<i>Main abbreviations</i>	58

Foreword by the Deputy Minister of Infrastructure and Transport



Italy, with its unparalleled seafaring tradition and a geostrategic position at the center of the Mediterranean, continues to represent an essential actor in the definition of global maritime policies. Our merchant fleet is recognized among the most important in the world, both in the crucial cargo transport segment and in the passenger sector, in which we excel with market-leading companies.

Added to this structural excellence is the international recognition of Italian seafarers, who are appreciated for their competence and rigor.

The year 2025 marked a historic moment for our international projection: at this year's Assembly, Italy achieved re-election to Category "A" of the Council of the International Maritime Organization (IMO), obtaining the maximum number of votes. This extraordinary result is tangible proof of the trust placed in our country by the international community and guarantees Italy a leading decision-making role in global maritime governance. The seat in Category "A" is the fundamental instrument through which the Italian Permanent Representation, in synergy with the Ministry of Infrastructure and Transport (MIT), protects and promotes the interests of our maritime cluster.

The maritime sector is undergoing continuous changes and is on the front lines of facing growing geopolitical instability. The joint action of the MIT and the Italian Representation at the IMO, the IOPC Funds, and the IMSO, focuses on indispensable strategic objectives. We actively support the ecological transition through the electrification of ports and incentives for fleet renewal with low-impact fuels and technologies. Italy is at the forefront of defining global environmental standards that go hand in hand with industry and are sustainable for the economy.

The efficiency and capability of the Port Captaincies – Coast Guard in the field of Navigation Safety, for example through Port State Control (PSC) activities, continue to ensure high quality and safety of navigation in our seas. We are focusing on the digitalization of processes, with the implementation of systems such as the Maritime Single Window, which is strategic for optimizing logistics and reducing bureaucratic burdens, improving the efficiency of the national port system.

We protect Seafarers and invest in their training of excellence, with institutions such as the Italian Merchant Marine Academy; we are actively engaged at the international level for the protection of rights and the fair treatment of maritime workers, including the promotion of inclusion and gender equality. Italy's commitment is founded on an integrated approach, which combines the technical expertise of the MIT with the diplomatic vision of the MAECI.

This consolidated strategy, reinforced by the maximum international support received at the IMO, allows us to contribute actively to the stability and prosperity of the global maritime system.

Italy confirms itself not only as an essential component of the world economy, but as a reliable partner and authoritative guide in the multilateral system, with the objective of building a safer and more competitive maritime future

The Hon. Edoardo Rixi

Foreword by the Italian Permanent Representative to the IMO, the IOPC Funds and the IMSO



It is with deep satisfaction and renewed enthusiasm that I present our second Annual Report, a document that not only summarizes the tireless work of Italy's Permanent Mission to the International Maritime Organization (IMO), the International Oil Pollution Compensation Funds (IOPC Funds), and the International Mobile Satellite Organization (IMSO), but also celebrates a milestone for our maritime foreign policy in 2025.

Italy, building on its centuries-old tradition and its unparalleled position as a pivotal player in the Mediterranean, has confirmed its position as a leading player in global trade and security. In 2025, this leadership was unequivocally reaffirmed.

The outcome of this year's IMO Assembly was a historic success and a clear demonstration of international trust: Italy was re-elected to Category "A" of the IMO Council, obtaining the highest possible number of votes.

This exceptional result strengthens our strategic leadership position among the world's leading maritime nations. Our Category A seat allows us to have a decisive impact on global regulation, virtuously balancing the interests of our shipowners with the need for a safer and more environmentally sustainable sector.

The success of 2025 is the culmination of a consolidation effort that began in 2024 with the establishment of the Maritime Office at the Italian Embassy, staffed by a dedicated expert from the Coast Guard, an additional senior officer from the Port Authorities, and a Petty Officer.

It is an efficient team that, under my leadership, has operated with determination and effectiveness in the three multilateral maritime forums.

First of all, in the International Maritime Organization, where we promoted advanced safety standards through its Maritime Safety Committee (MSC), in order to address technological innovation and growing digitalization, with a particular focus on seafarer protection and the important issue of autonomous ships.

We were active participants in negotiations for the decarbonization of the sector in the Environmental Protection Committee (MEPC), working towards approval of the Net-Zero Framework to actively contribute to achieving global greenhouse gas emission reduction targets.

In the Legal Committee (LEG), we advocated for the harmonization of regulations to protect victims of maritime accidents and the environment, focusing on shipowner liability, and we addressed important issues such as the dark fleet together with our European colleagues.

Finally, in the Facilitation Committee (FAL), we actively supported the implementation of the Maritime Single Window for logistics efficiency, proudly leading the national example.

Regarding the IOPC Funds and IMSO: We have continued to promote effective and transparent management of oil pollution compensation mechanisms (IOPC) and to support the strengthening of satellite technologies for maritime communications and Search and Rescue operations (IMSO).

The Italian maritime sector, with one of the largest and most modern fleets, is a pillar of our economy and a crucial driver of our foreign policy. Our Representation is the voice that translates these national

priorities into concrete actions, ensuring an integrated approach that combines the technical excellence of our experts with diplomatic vision.

We confirm our commitment to maintaining a constant and highly qualified presence in all locations, using the strengthened mandate obtained in 2025 to promote innovative, sustainable, and inclusive solutions. Italy intends to consolidate its role as a global leader in the maritime world, contributing to the construction of a safer and more prosperous future for all.

Ambassador Inigo Lambertini

CHAPTER I

The Role of the Italian Permanent Representation to the IMO

SUMMARY: 1. ABOUT THE IMO. – 1.1 THE IMO CONVENTION – 1.2 A FOCUS ON SAFETY – 1.3 PROTECTION OF THE MARINE ENVIRONMENT – 1.4 SATELLITE DISTRESS AND SAFETY COMMUNICATIONS – 1.5 SAFETY MANAGEMENT AND TRAINING – 1.6 MARITIME SECURITY – 1.7 CAPACITY DEVELOPMENT – 1.8 ADDRESSING THE CLIMATE CRISIS - 2. ITALY'S ROLE WITHIN THE COUNCIL. 2.1 COUNCIL 134 – 2.2 COUNCIL 135, ASSEMBLY 34 AND COUNCIL 136 - 3. HOT TOPICS IN IMO - 4. STRENGTHENING THE ITALIAN PRESENCE IN IMO WORK. 4.1 THE MARITIME OFFICE – 4.2 – TRAINING OPPORTUNITIES AT IMLI

1. Notes on the IMO

The International Maritime Organization (IMO) is a specialized agency of the United Nations, established following the adoption of the 1948 Geneva Convention on the International Maritime Affairs. Its institutional mandate is to promote effective intergovernmental and technical cooperation among member states, essential to ensuring the highest standards of safety and security of navigation, as well as pollution prevention and protection of the marine environment. The Organization currently has 176 member states and is headquartered in London.

1.1 The IMO Convention

The need to regulate international navigation dates back to the mid-19th century, when numerous maritime treaties were adopted. The need for a permanent international body to enhance maritime safety led to the convening of the United Nations Maritime Conference in Geneva in 1948. This conference led to the adoption of the Convention establishing the Inter-Governmental Maritime Consultative Organization (IMCO). The Organization officially became the International Maritime Organization (IMO) in 1982. The IMCO Convention entered into force in 1958, and the first official meeting of the Organization was held the following year. As defined in Article 1(a) of the Convention, the purposes of the IMO are: to provide a framework for cooperation among governments in the regulation and technical practices relating to international maritime trade; and to encourage and facilitate the widespread adoption of the highest practicable standards in three key areas: maritime safety, efficiency of navigation, and the prevention and control of marine pollution from ships. Furthermore, the Organization is also competent to manage administrative and legal issues related to these objectives.

1.2 Focusing on Safety

Among the IMO's first significant actions was the adoption, in 1960, of the fourth edition of the International Convention for the Safety of Life at Sea (SOLAS). This was later replaced by the 1974 SOLAS Convention, which introduced a fundamental innovation: the tacit acceptance procedure. This mechanism provides that an amendment automatically enters into force on a set date unless an objection is received from an agreed number of member states before that deadline. The 1974 Convention has remained the reference text and has had numerous updates and amendments over time. The primary objective of SOLAS is to establish minimum standards for the construction, equipment, and operation of ships, ensuring their safety at sea.

1.3 Protection of the marine environment

The increasing volume of oil transported by sea, combined with the growing size of oil tankers, had generated considerable concern. These fears were dramatically confirmed by the Torrey Canyon disaster in 1967, which clearly demonstrated the scale of the environmental problem. In response, the IMO was urged to introduce a series of initiatives aimed at preventing accidents and mitigating their consequences. The key measure was the adoption of the International Convention for the Prevention of Pollution from Ships of 1973, later supplemented by the 1978 Protocol and known as MARPOL 73/78. This Convention extended its scope beyond oil pollution (accidental and operational) to include pollution from chemicals, packaged goods, sewage, waste, and air pollution. At the same time, the IMO was tasked with establishing a compensation system for financial damages caused by pollution; This resulted in the adoption of three separate legal instruments: the CLC (International Convention on Civil Liability for Oil Pollution Damage) signed in Brussels in 1969, the FUND Convention (International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage) of 1971 (which established a supplementary fund for damage caused by cargo transported), and finally the Bunker Oil (International Convention on Liability for Bunker Oil Pollution Damage) of 2001 (which regulates civil liability for damage caused by the spillage of fuel used for navigation).

1.4 Satellite-based emergency and safety communications

The need to optimize maritime search and rescue procedures led, in the 1970s, to the implementation of a global system supported by the International Mobile Satellite Organization (IMSO). This initiative significantly enhanced the ability to transmit radio messages and other essential communications to ships. Subsequently, the Global Maritime Distress and Safety System (GMDSS) was adopted in 1988, and its phased introduction began in 1992. In February 1999, the GMDSS became fully operational, ensuring that a ship in distress anywhere in the world can receive assistance even if the crew does not have time to send a radio distress call, thanks to the automatic transmission of the distress message. Under the Safety of Life at Sea (SOLAS) Convention, cargo ships with a gross tonnage of 300 tons or more and all passenger ships engaged in international voyages are required to equip themselves with satellite and radio equipment that meets international standards. In maritime areas not reached by terrestrial radiocommunications systems, the GMDSS relies primarily on satellite communications to enable mariners to send distress alerts and receive essential safety information, such as navigational warnings and weather forecasts.

1.5 Safety management and training

Two initiatives from the 1990s are particularly important insofar as they address the human element of navigation. On July 1, 1998, the International Safety Management Code entered into force, becoming applicable to passenger ships, oil and chemical tankers, bulk carriers, gas carriers, and high-speed cargo craft of 500 gross tonnage and over. It became applicable to other cargo ships and mobile offshore drilling units of 500 gross tonnage and over on July 1, 2002.

On February 1, 1997, the 1995 amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) of 1978 entered into force. These amendments significantly improved seafarers' standards. A major revision of the STCW Convention and Code was completed in 2010 with the adoption of the Manila Amendments to the STCW Convention and Code.

1.6 Maritime Security

Two initiatives adopted in the 1990s are particularly significant for their impact on the human element in shipping. On July 1, 1998, the International Safety Management Code (ISM Code) entered into force, initially applicable to passenger ships, oil tankers, chemical tankers, bulk carriers, gas carriers, and high-speed cargo craft of 500 gross tonnage and above. Its applicability was extended to other cargo ships and mobile offshore drilling units of 500 gross tonnage and above on July 1, 2002. Furthermore, the 1995 amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) 1978 entered into force on February 1, 1997. These amendments have led to a significant improvement in the training and professional standards of seafarers. A significant revision of the STCW Convention and Code was completed in 2010 with the adoption of the Manila Amendments to the STCW Convention and Code.

1.7 Capacity Building

The IMO Member State Audit Scheme (IMSAS) has acquired a crucial role in strengthening the global implementation of maritime regulations, becoming mandatory as of January 1, 2016, under specific IMO primary instruments. The audit regime is designed to provide each Member State with a comprehensive, systematic, and objective assessment of the extent to which it fulfills its responsibilities and obligations as a Contracting Party, assessing the effectiveness with which it administers and implements key provisions of fundamental conventions such as SOLAS, MARPOL, STCW, CLC, and COLREG. The IMSAS transcends mere compliance, serving as an essential implementation support tool, designed to assist states in identifying gaps in their legislative and administrative frameworks in areas such as legislative capacity and oversight of flag states, port states and coastal states. The identification of such areas for improvement ultimately aims to promote consistency and uniformity in the application of IMO rules worldwide, significantly contributing to maritime safety and environmental protection.

1.8 Tackling the climate crisis

An increasingly urgent challenge is addressing harmful greenhouse gas (GHG) emissions from maritime shipping. As a member of the United Nations, the IMO is committed to supporting the UN's Sustainable Development Goal: take urgent action to combat climate change and its impacts, in line with the 2015 Paris Agreement to reduce greenhouse gas emissions that cause global warming.

The first set of internationally mandatory measures to improve the energy efficiency of ships was adopted in 2011. Since then, the IMO has adopted additional measures, such as the initial GHG strategy in 2018 and, in 2023, the revised strategy on the reduction of GHG emissions from ships. This latter strategy, through a just and equitable transition, aims to gradually reduce GHG emissions from maritime shipping and eliminate them entirely by 2050.

2. Italy's role in the Council.

Italy has been a member of Category A of the IMO Executive Council, without interruption, since the Council was created. The category includes states that, thanks to the importance of their merchant fleets, make a significant contribution to the development of international maritime transport. At the 34th session of the IMO assembly (24 November – 3 December 2025), Italy was re-elected to the role, in a voting session in which Italy and China took joint first place, with 155 out of 169 votes. Being included in Category A is an acknowledgement not only of the strategic importance of the Italian maritime sector but also of our country's leading role at international level in the promotion of safety and sustainability in navigation.

This membership gives Italy direct influence on the drawing up of international rules on maritime safety, protection of the marine environment, and facilitation of international maritime transport. Italy thus has a primary role in the decisions that regard the future of international maritime transport.

2.1 134th session of the IMO Council

During the 134th session of the IMO Council, the Secretary-General recalled the attacks in the Black Sea and the more recent ones in the Red Sea, resulting in the deaths of several seafarers and the disappearance of others. European states and like-minded groups condemned the Houthi attacks and recalled the decisions of the United Nations Security Council firmly condemning any attack directed at merchant vessels. Italy continues its national commitment to the European defensive operation "Aspides," in which Italy is currently the Force Commander.

Regarding the situation in the Black Sea, ongoing activities were outlined, in line with Resolution A.1183(33), which aim to mitigate the impact of the conflict on international maritime transport. These efforts include technical assistance and continuous monitoring of the established maritime corridor.

Furthermore, the issue of reports of alleged disruptions to GMDSS emergency services was addressed: it was confirmed that INMARSAT has maintained full emergency services operations, as previously discussed at IMSO AC 51.

The strategic plan and the action and implementation plan for the 2026-2027 biennium were presented, including actions for gender equality, a detailed analysis of the performance report, the report of the internal inspection and ethics unit, and the revised strategy for the Organization for the period 2024-2029.

The Council authorized the IMO Secretary-General to make timely transfers between strategic directorates, provided that funds are available. In approving the budget framework for the 2026-2027 biennium, Member States requested every effort to mitigate expenditure increases resulting from external factors.

The Secretariat presented to the Council the five pillars of the guidelines prepared for strengthening multilingualism at the IMO following the adoption of Assembly resolution A.1180(33).

In this regard, several Arabic-speaking states proposed including Arabic among the "working languages" of the Assembly alone. The proposal, similar to that formulated at C133, would involve a step-by-step approach to contain costs. While recognizing its value and importance, the proposal has met with concern regarding its economic impacts, which are not currently clearly quantified. Therefore, the Secretariat has been asked to undertake a thorough assessment of the impact on all IMO services for the 2027 Assembly alone, to be presented at the next C135.

Additional topics discussed included:

- the reporting of States' contributions to the Organization and the introduction of the new Contribution Incentive Scheme (CIS) to incentivize IMO members to pay their contributions promptly, rewarding them with interest earnings;
- the IMO number regime, on which two draft resolutions were discussed and approved for the next Assembly;
- the report on the activities of the IMO-led audit scheme (IMSAS);
- the revision of the Council Rules;
- the approval of the Assembly's provisional agenda;
- the granting of consultative status to the International Boatmen's Linesman's Association (IBLA);
- the proposal to create a new GHG Subcommittee, which will be discussed at the next MEPC meeting. The Secretariat will provide an analysis of the financial aspects and workload;
- the approval of the consolidated text of the IMO Convention, including the Arabic, Chinese, and Russian languages;
- the Global Integrated Shipping Information System (GISIS) data review and management project.

2.2 Council 135, Assembly 34 and Council 136

Council 135 (C 135) and Preparatory Sessions

The 135th session of the Council (C 135), which preceded the 34th Assembly (A 34) held from November 24 to December 3, 2025, focused on preparation and internal administration. The Council reviewed outputs for the 2024-2025 biennium and examined information related to human resources, particularly the revision of the Staff Regulations, in order to align the duties and responsibilities of IMO staff with those established by the United Nations.

In view of the subsequent elections, the Council defined the situation of States whose right to vote had been suspended due to failure to pay their membership fees. This topic was also addressed by Assembly 34. The gradual introduction of Arabic as a working language (limited, at this stage, to Assembly 34 only), the revision of the Integrated IMO Identification Number Scheme, and the distribution of costs were also approved.

Finally, the States (including Italy) that had hoped for the adoption of the Net Zero Framework expressed regret at the failure to approve it in MEPC 83, declaring their commitment to continue the work.

Assembly 34 (A 34): Strategic Decisions and Council Elections

The Italian delegation, led by Deputy Minister Rixi, participated actively. The delegation consisted of staff from the Permanent Representation's Maritime Office and representatives of the Ministry of Infrastructure and Transport.

Assembly 34 (A 34) was characterized by intense political debates and crucial decisions. During the opening general statements, the Deputy Prime Minister of Ukraine and the Director of the Lithuanian Maritime Administration urged states not to vote for the Russian Federation to be a candidate for Council Category A membership, drawing attention to the dark fleet phenomenon, which they called a "current threat requiring a coordinated global response." The Russian Director responded by asking for support, justifying the candidacy by citing its role as a "responsible maritime nation" and its regulatory contributions on nuclear and autonomous vessels, as well as the need to re-establish broader geographical representation. The Assembly formally adopted the revised Strategic Plan for 2024–2029 and approved the budget and work programme for 2026–2027.

It also adopted several resolutions on key aspects of the Organization's work, including the following:

- IMO Capacity Development Strategy;
- Port State Control Procedures;
- Guidelines for Inspections under the Harmonized System of Survey and Certification (HSSC);
- Non-exhaustive list of 2025 obligations under the relevant instruments of the IMO Instruments Implementation Code (III Code);
- Framework and Procedures for the IMO Member State Audit System (IMSAS);
- Code on Alerts and Indicators;
- Criteria for the provision of mobile satellite communications in the Global Maritime Distress and Safety System (GMDSS);
- Charges for distress, urgency, and safety communications via mobile satellite services recognized in the GMDSS;
- Consolidated Text of the Convention on the International Maritime Organization;
- Progressive use of Arabic as the working language of the Organization;
- Criteria and procedures for live streaming of IMO Assembly plenary meetings to the public;
- Rules of Procedure of the Assembly;
- Relations with non-governmental organizations.

The Assembly took note of the reports submitted by the various Technical Committees.

In the context of the Maritime Safety Committee (MSC) report, one Member State again expressed reservations regarding INMARSAT's alleged discontinuance of mandatory GMDSS services to its

ships. As has been the case in previous sessions, IMSO has expressed its willingness to discuss this matter further with INMARSAT.

Regarding the Marine Environment Protection Committee (MEPC) report, some Pacific island states expressed concern. These states complained about the procedural handling of the motions raised in the Committee, which they deemed inconsistent with the Rules of Procedure, and therefore requested a formal analysis of the matter by the IMO Secretariat.

Finally, regarding the Technical Cooperation Committee (TC) report, the same Member State once again raised its concerns regarding its exclusion from IMO technical cooperation projects. Since this issue had already been widely discussed and resolved in previous sessions, the Assembly merely acknowledged the submission without further debate.

The elections saw 169 out of 176 states admitted to the vote, with Italy reconfirming its position in Category A with an exceptional result of 155 votes (91.7%), placing it jointly in first place with China. The Council members elected for the two-year term are:

- Category A: Italy, China, Korea, Greece, United Kingdom, Japan, Panama, USA, Norway, Liberia.
- Category B: Australia, Brazil, Canada, United Arab Emirates, France, Germany, India, Netherlands, Spain, Sweden.
- Category C: Belgium, Chile, Cyprus, Finland, Malta, Peru, Philippines, Saudi Arabia, South Africa, Turkey, Egypt, Singapore, Bahamas, Nigeria, Qatar, Malaysia, Mexico, Morocco, Indonesia, Jamaica.

On the sidelines of the meeting, the Italian delegation conducted intense diplomatic activity: the Deputy Minister had an update with the Secretary General of the Organization and conducted a series of bilateral government-level discussions with representatives of the United Kingdom, Georgia, Greece, Malta, Turkey, Ukraine, China, United States, Morocco, Qatar, and Saudi Arabia. The focus of these meetings was to explore new forms of collaboration in the maritime sector and support the implementation of capacity building in the respective countries.

Council 136 (C 136)

The 136th session of the Council (C 136) followed the Assembly with the installation of the newly elected members and the reappointment of Victor Jimenez of Spain as Chair of the Council.

3. IMO Hot topics

- The discussion highlighted the crucial need to combat **dark/shadow fleets**, fleets operating outside transparency and international standards. It was universally recognized that such vessels must be treated strictly as sub-standard vessels, given the significant threat they pose to both navigational safety and the protection of the marine environment. For the first time, the topic was officially included on the agenda of the Legal Committee (LEG), a crucial step in addressing the legal implications of the phenomenon.
- **Decarbonization**: entering into full swing and analyzing data and solutions to achieve the goal of implementing mid-term measures. This is a process that will lead to net zero by 2050. The Italian Permanent Representation is following the progress of the work with the support and synergy of the staff and experts of MASE and the Marine Environmental Department of the Port Authority-Coast Guard. The inevitable impact of these decisions on a maritime economy that plays a key role in the country's economic and commercial system requires concerted effort, including the essential participation of stakeholders and national experts in the sectors.
- - The topic of **geopolitics and global maritime traffic security** remains central to the IMO's agenda. The Organization continues to closely monitor critical developments in the Red and Black Seas. A specific focus has been placed on efforts to secure the release of the crew of

the Galaxy Leader ship. These recent and complex geopolitical scenarios have prompted the IMO to act swiftly, developing operational tools and actively promoting training and crucial information exchange among Member States. In this context, the IMO has given a strong impetus to capacity-building activities to strengthen maritime security expertise globally. Italy has assumed a prominent role in this international framework. The commitment of Italian naval vessels in high-risk areas and the roles performed by the Port Authority-Coast Guard within the Interministerial Committee for Maritime Transport and Port Security (CISM), as the designated security authority, have significantly contributed to Italy's international visibility within the IMO. This visibility was further enhanced through several presentations in plenary sessions.

- **Autonomous ships and alternative fuels:** the development of "autonomous" ships, known by the acronym MASS (Maritime Autonomous Surface Ships), falls within the scope of the IMO's historic role of developing a regulatory framework for maritime security. This process involves a comprehensive review of existing regulations and the definition of new standards for communications and cybersecurity, aspects that are amplified by the growing digitalization of maritime transport. The gradual transition to new alternative fuels (methanol, hydrogen, ammonia) also requires significant technical adjustments and navigation safety standards to address and mitigate the new risks associated with these latest emission reduction measures. This also includes the development of new models and the implementation of conventions on crew training and education. The Italian delegation has been among the most active in implementing the IMO strategy on decarbonization and new alternative fuels.
- **Inclusivity and gender equality** in the maritime sector are among the main priorities of the IMO's current policy. Significant changes have been made within the Organization's senior positions to ensure respect for gender equality and greater participation in decision-making roles that are attentive to inclusion and rural countries. The Italian Representation has supported related initiatives at all times.

4. Strengthening Italy's presence in the IMO

4.1 The activities of the Maritime Office

To ensure more effective and timely management of IMO-related activities and to address global challenges with greater resilience and proactivity, from maritime safety to environmental sustainability and the economic development of maritime communities, the Maritime Office was established in 2024 at the Embassy of Italy in London.

Strategic Tasks and Functions

The Maritime Office is not limited to participating in the work of the International Maritime Organization (IMO), the International Oil Pollution Compensation Funds (IOPC FUNDS), and the International Mobile Satellite Organization (IMSO), but also performs key tasks:

- **Coordination and Strategy:** Ensures the coordination of Italian delegations at relevant international bodies, with the primary objective of maximizing Italy's influence in decision-making processes and actively contributing to the development of international maritime policies.
- **Regulatory Development:** Actively contributes to defining international standards for safety, environmental protection, and the regulation of new technologies applied to navigation.
- **Promoting Dialogue:** Organizes events and reflections on emerging challenges, engaging experts, institutions, and stakeholders to explore crucial issues such as sustainability, digitalization, and

security. It also fosters constructive dialogue between the public and private sectors, promoting innovative and shared solutions.

- **Consular Support:** Provides technical and operational support to the Consulates General of Italy in London and Edinburgh, and to the Consulate General in Manchester, on complex maritime matters, including assistance to Italian seafarers, managing technical documentation compliant with international standards, and promoting the interests of the Italian industry in the United Kingdom.

Promotional and Institutional Activities (2025)

During 2025, the Maritime Office implemented several key initiatives:

- ***Training and Awareness-Raising***

- February 7: IMO Visit for the Coast Guard: The Office organized a visit to IMO Headquarters for 18 officers from the Coast Guard Pre-Command Lieutenant Course. The meeting provided an opportunity to illustrate the functions of the United Nations specialized agency, highlighting the essential role of the Italian Coast Guard in the performance of safety, security, and environmental protection functions.
- February 12: Debate on Maritime Sustainability: The first in a series of debates dedicated to sustainable shipping, entitled "Towards Sustainability: Greener Seas for a Better Tomorrow," was held at the Italian Embassy in London. The event brought together eminent experts (including Professor Belja of IMLI and Professor Canepa of the World Maritime University) who discussed the challenges, opportunities, and role of alternative fuels (biomethane and hydrogen) and advanced technologies, moderated by Financial Times correspondent Claudia De Meulemeester.

- ***IMO Candidacy and Maritime Diplomacy***

- June 26: Official Presentation of the Candidacy: The official presentation ceremony of Italy's candidacy for re-election to Category "A" of the IMO Council for the 2026–2027 term took place at the Embassy of Italy in London. Ambassador Inigo Lambertini opened the proceedings by reaffirming Italy's historic ties and constructive role. The presence of the IMO Secretary General, the Directors of the IOPC Funds and IMSO, along with Assarmatori, Confitarma, RINA, and Fincantieri, testified to the international support and excellence of the Italian maritime system. Italy presents itself as a responsible and proactive player, upholding the fundamental principles of the IMO and focusing on the blue economy, digitalization, and sustainability.
- November 19: Reception at the Assembly: During the November 2025 Assembly, the Office organized a reception dedicated to promoting the candidacy, presenting the Aide Memoire to Member States.

Outreach and Institutional Events

- July 2: Presentation of the First Report in Naples: During the third Maritime Symposium, Ambassador Inigo Lambertini presented the First Report of the Permanent Representation of Italy to the IMO. The report, attended by approximately 150 international delegates, comprehensively documents Italy's national activism and influence on the IMO's pillars: Safety, Security, and Environmental Protection.
- July 7-8: Presentations to the IMO Council (C 134): Italy gave two key presentations, illustrating the results of the Vespucci world tour (with the return of the IMO flag to the

Secretary General) and promoting the major international events that Rome will host in September 2025: the European Coast Guard Forum (ECGFF), the Mediterranean Coast Guard Forum (MCGFF), and the 4th Global Coast Guard Summit (CGGS).

Participation in International Events

Representation staff also participated in important global maritime forums:

- “World Maritime Parallel Event” (Dubai): The event, with the theme “Our Ocean, Our Obligation, Our Opportunity,” paid close attention to the phenomenon of “dark fleets” (fleets operating outside safety and environmental standards). Agreement was reached on strengthening technical cooperation and capacity-building for the effective application of IMO instruments, and negotiations were updated for the adoption of new binding regulations aimed at climate neutrality in maritime transport by 2050.
- "Maritime Cyprus 2025" Conference (Limassol): The biennial conference brought together over 1,000 participants to discuss the theme "Unlocking the Future... of Shipping." The program analyzed the major changes and opportunities in the sector, focusing on energy transition, digitalization, financing strategies, and crew welfare.

During the November 2025 Assembly, the Maritime Office organized a further reception on November 19th at the Headquarters, presenting the Aide Memoire and promoting our candidacy for Category A membership of the IMO Council for the 2026-2027 biennium.

4.2 Training opportunities at IMLI

Italy's commitment to strengthening international maritime expertise has seen significant results, including through collaboration with the International Maritime Law Institute (IMLI).

For the first time, an officer from the Coast Guard participated in one of the IMLI's specialist courses. The officer attended the "Law of Ports" course, a program aimed at industry professionals, ranging from port managers and legislative drafters to maritime operators and lawyers. The course emphasized the importance of maintaining the uninterrupted flow of the global supply chain and ensuring robust measures for the repatriation and travel arrangements of seafarers and passengers, consistent with the health and safety restrictions imposed by port States.

Furthermore, Italian colleagues were able to participate in the online courses made available free of charge by the IMLI to all IMO Member States.

At the end of this course, the officer developed a maritime legislative drafting project that was awarded the prestigious Comité Maritime International (CMI) Award for Best Maritime Regulatory Project of the year 2024-2025.

The award-winning project, entitled "A Law to Incorporate the International Convention for the Safe and Environmentally Sound Recycling of Ships into Italian National Legislation, and to Provide for the Effective Implementation Thereof," was developed as part of the Master of Humanities (M.Hum.) in International Maritime Legislation program at the IMLI, constituting part of the academic requirements for the degree.

The project stood out for its technical, legal, and scientific rigor and its strategic vision, addressing a highly topical issue related to environmental sustainability and the effective implementation of international ship recycling regulations. Its exceptional quality testifies to the excellence of the training received and the constant commitment of Italian institutions to promoting legality and maritime environmental governance globally.

CHAPTER II

Activity in IMO Committees and Subcommittees

SUMMARY: 1. ITALY'S CONTRIBUTION TO THE MARINE ENVIRONMENTAL PROTECTION COMMITTEE (MEPC 83). – 1.1 OUTCOME OF THE EXTRAORDINARY MEETING OF THE MARITIME ENVIRONMENTAL PROTECTION COMMITTEE (MEPC 83 ES 2) – 1.2 THE WORK OF THE PPR SUBCOMMITTEE – 2. THE WORK OF THE COMMITTEE ON THE LONDON CONVENTION AND THE LONDON PROTOCOL - 3. ITALY'S ROLE IN THE MARITIME SAFETY COMMITTEE (MSC). 3.1 THE WORK OF THE SDC SUBCOMMITTEE – 3.2 THE WORK OF THE HTW SUBCOMMITTEE – 3.3 THE WORK OF THE SSE SUBCOMMITTEE – 3.4 THE WORK OF THE NCSR SUBCOMMITTEE – 3.5 THE WORK OF SUBCOMMITTEE III - 3.6 THE WORK OF THE CCC SUBCOMMITTEE - 4. THE SIMPLIFICATION PROCESS IN THE MARITIME SECTOR CARRIED OUT WITHIN THE FAL COMMITTEE. – 5. TECHNICAL COOPERATION (TC). - 6. LEGAL ASPECTS ADDRESSED WITHIN THE LEGAL COMMITTEE (LEG) – 7. INSIGHTS – 7.1. IN-DEPTH STUDY – THE NEW IMO-ILO GUIDELINES FOR THE PROTECTION OF DETAINED SEAFARERS AND IMO PRIORITIES: TOWARDS FAIR TREATMENT AND THE COMBAT OF SUBSTANDARD NAVIGATION – 7.2 IN-DEPTH STUDY – UNDERWATER RADIATED NOISE (URN) – AN INVISIBLE EMERGENCY IN THE OCEANS

1. Italy's contribution to the Marine Environmental Protection Committee (MEPC 83)

The eighty-third meeting of the Marine Environment Protection Committee (MEPC 83) focused, in particular, on the adoption of medium-term measures to reduce GHG emissions, the final report of which is the result of intense two-week negotiations. The United States delegation did not participate in the negotiations held during the eighty-third session of the Marine Environment Protection Committee (MEPC 83). On April 8, the United States officially communicated its national position on the ongoing negotiations to other Member States. In summary, the US administration made clear that it is not willing to accept international environmental agreements that impose "undue or unfair burdens on the country or the interests of the American people." The administration's stated priority is a return to energy leadership. Consistent with this approach, the United States formally declared its opposition to efforts promoted within the IMO to reduce greenhouse gas (GHG) emissions from international shipping.

Geopolitical Positions on Environmental Measures (MARPOL Annex VI)

Two distinct groups of Member States have expressed divergent positions regarding the proposed amendments to MARPOL Annex VI, regarding medium-term emission reduction measures:

Opposition to the Measures (Middle East and Allies Group)

The Saudi Arabian delegation, acting also on behalf of the delegates from Bahrain, Iran, Iraq, Jordan, Qatar, Kuwait, Malaysia, Oman, Pakistan, the Russian Federation, Thailand, the United Arab Emirates, Venezuela, and Yemen, issued a joint statement of opposition.

The group believes that the proposed medium-term measures are detrimental to the maritime sector, particularly for developing nations, which are significantly dependent on this sector for their economies. The delegation reserved the right to express its final position regarding the Group's decision to invite the Committee to approve the proposed amendments to Annex VI.

Call for Greater Ambition (Pacific Island States)

The Marshall Islands delegation, also representing the delegations of Fiji, Seychelles, Solomon Islands, Tuvalu, and Vanuatu, expressed disappointment with the text of the draft amendments to MARPOL Annex VI. These island states deemed the text insufficiently ambitious to address the urgency of the climate crisis, emphasizing the need for more aggressive measures to reduce emissions.

Negotiations on Medium-Term Measures (GHG)

The discussion on medium-term measures to reduce greenhouse gases (GHG) was complex and concluded with the adoption of amendments to MARPOL Annex VI by roll-call vote, overcoming the initial lack of consensus.

The coordinated European position – based on shared EU-Member State competence – originally envisaged the combination of a universal emissions tariff and a fuel standard. These measures were subject to specific conditions: the achievement of the objectives of the IMO 2023 Strategy, the creation of a stable revenue stream to incentivize Zero Net Zero (ZNZ) fuels, the possibility of passing on costs to the commercial operator, and the distribution of revenues in a fair and universal manner, without categorical exclusions. The adoption of the well-to-wake principle (from well to end-use) and the need to ensure a level playing field were also emphasized.

The European tariff has been replaced by the Singapore proposal, which introduces a compliance mechanism based on two emission intensity thresholds and the Z-factor. This system incentivizes the most efficient ships (below the first threshold) with the allocation of transferable surplus units. It also includes increasing penalties for the least efficient ships: a cost of \$100 per tonne of CO₂ equivalent for the intermediate range and an increased cost of \$380 per tonne for ships above the "baseline" threshold. The option to pass on costs to the commercial operator and the "No one is left behind" principle (i.e. not categorically excluding countries from revenue distribution) were retained by the EU proposal.

Despite their adoption, it was noted that the annual reduction coefficients established until 2035 may not fully achieve the objectives of the GHG Strategy, which is scheduled for review every five years starting in 2028. The guidelines for calculating emissions and managing economic flows (estimated at between \$30 and \$40 billion by 2030) will be developed in dedicated technical sessions and provide for a distribution of funds between subsidies for ZNZ fuels and climate projects in developing countries (SIDs and LDCs), while allowing all states to access the funds.

Review of Short-Term Measures (STM)

The session analyzed the Carbon Intensity Indicator (CII) and fleet efficiency report for 2023, confirming a decrease in average carbon intensity also attributable to the entry into force of the short-term measures (EEXI and CII).

The ISWG APEE 1 has made progress in finalizing the draft amendments to MARPOL Annex VI and the related guidelines, establishing the CII reduction factors (Z) for the period 2027–2030. Despite initial consensus, some states (including Saudi Arabia, Iran, and the Russian Federation) unexpectedly raised objections to the applicability of the Z factor to certain developing nations, requiring a comprehensive impact assessment. Approval was nevertheless achieved thanks to strong intervention by supportive states (such as the UK, the EU, Japan, Korea, and island states).

However, the working group failed to reach agreement on mandatory fuel oil sampling guidelines or the introduction of a mandatory licensing system for fuel suppliers, and also failed to finalize the draft guidelines on the use of engine load monitoring (ELM).

Other Key Environmental Results

- **Emission Control Zones (ECAs) and Particularly Sensitive Areas (PSSAs):** The European proposal to designate the Northeast Atlantic Ocean as an ECA for sulfur and nitrogen oxides was approved. Similarly, the Peruvian proposal, supported by Italy, to designate the Nasca Ridge reserve as a PSSA (Particularly Sensitive Sea Area) was approved.
- **Marine Plastics:** The integration of the 2025 Action Plan with the Marine Plastics Strategy into a single MEPC Resolution was supported, with the details being delegated to PPR Subcommittee 13.
- **Biofouling:** The development of a legally binding regulatory framework for the control and management of vessel biofouling was discussed, aiming to limit the spread of invasive aquatic species and increase energy efficiency, balancing initial costs with operational savings.
- **Underwater Radiated Noise (URN):** EU states shared the URN Action Plan and adopted marine strategies, presenting four European projects (NAVISON, SATURN, PIAQUO, ECoSS) that use new technologies for the mitigation and analysis of underwater noise.
- **Ship Recycling:** European states urged the submission of the approved interpretative guidelines (to resolve the critical issues between the Basel and Hong Kong Conventions (HKC)) to the Basel Secretariat to clarify the relationship between the two regulatory regimes.
- **Air Pollution Prevention:** The Canadian proposal on the evaluation of naval scrubbers was debated. Italy defended its position of progressively phasing out these systems, while ensuring recognition for early movers.
- **NOx Code 2008:** Amendments relating to the use of multiple operating profiles for marine diesel engines have been approved, effective from 1 March 2027.

1.1 Outcome of the extraordinary meeting of the Maritime Environment Protection Committee (MEPC 83 ES 2)

From October 14 to 17, 2025, the Extraordinary Session of the Marine Environment Protection Committee (MEPC 83 ES 2) was held at IMO Headquarters. The session was dedicated to the final adoption of the decarbonization and greenhouse gas (GHG) emission reduction measures in the maritime sector, previously approved at MEPC 83. The Permanent Representation actively participated, supported by staff from the IMO's Maritime Office, representatives of the Ministry of Environment and Energy Security, and national stakeholders.

The Net-Zero Framework (NZF), the result of a compromise reached at MEPC 83, catalyzed intense diplomatic activity in preparation for the Committee, with the opposition countries, led by the United States, demarching, countering the European position aimed at consolidating the support of the states that had abstained from the previous vote. The entire session was dominated by the sharp opposition between two blocs of states, hampering the progress of the work since the adoption of the agenda, marked by reservations and procedural issues raised by the United States, Arab states, and the Russian Federation.

The Opposition to MARPOL Annex VI

During the analysis of the amendments to MARPOL Annex VI, two camps clearly emerged:

- **Full Support:** States from across the European continent, the Pacific Island States, and numerous African (including South Africa, Kenya), Asian (Indonesia, China, Turkey, Malaysia, Bangladesh), and American (Brazil, Canada) countries expressed support.

- **Lack of Support:** The United States, all Arab states, the Russian Federation, Argentina, Venezuela, Nigeria, Pakistan, India, Liberia, the Bahamas, and the Marshall Islands (including most of the world's major shipping registers) expressed opposition. The arguments put forward, though varied, ranged from rising costs and implementation difficulties, to unresolved issues related to SIDS (Small Island Developing States), the shortage of alternative fuels, and the alleged lack of broad consensus. In particular, the US delegation lamented the lack of a binding EU assurance regarding the removal of regional regulations, characterized the NZF as a global carbon tax, and expressed distrust in the IMO's ability to administer the proceeds of the fund to be established.

With a total of 46 states in favor, 16 against or ambiguous, and 34 abstentions, the Committee nevertheless sent the relevant documentation to the Drafting Group (DG). The industry (ICS, IAPH, INTERTANKO, CESA) expressed support for the adoption of the NZF, emphasizing the urgent need for a clear regulatory framework to proceed with investments.

Clash Over the Adoption Procedure

A moment of intense tension arose with the motion advanced by the United States and Saudi Arabia requesting an alternative adoption procedure. Although the default procedure is opt-out (tacit acceptance within ten months, Article 16 MARPOL), the US requested the use of the opt-in procedure (express acceptance by two-thirds of States and 50% of global tonnage, Article 16, paragraph 2, subparagraph f, subparagraph ii). The opt-in procedure, which has been discontinued since 1973, was rejected by the Committee because it was deemed to create temporal uncertainty and contradict industry calls for urgent regulation.

Despite widespread opposition to the US and Saudi motion, an agreement was reached to include in the Draft Resolution an explicit reference to the fact that the NZF "is the only global maritime mid-term measure for international shipping," in order to prevent double taxation by regional mechanisms.

Outcome and Final Postponement

The attempt to continue the work encountered a deep and growing division among States, culminating in the cancellation of an entire afternoon session to allow the Secretary-General to hold direct consultations with the various negotiating blocs.

Subsequently, a decisive vote motion was advanced by Saudi Arabia requesting a one-year adjournment of the plenary session due to the persistent and irreconcilable lack of consensus. The vote produced the following result: 57 votes in favor, 49 against, and 21 abstentions.

The motion was approved, effectively postponing the work on the Net-Zero Framework (NZF) and resulting in a delay in the deadlines set out in the IMO Greenhouse Gas (GHG) Reduction Strategy.

1.2 The work of the PPR Subcommittee

The twelfth session of the Subcommittee on Pollution Prevention and Response (PPR 12) was held in January 2025. In addition to staff from the Headquarters' Maritime Office, representatives of the

Ministry of Environment and Energy Security and national stakeholders actively participated in the work.

Critical Environmental Issues

1. **Management of Plastic Pellets** The Plenary did not reach consensus on the various proposals put forward for the management of the transport of plastic pellets (which included assigning a new UN dangerous goods number, introducing a new Chapter in MARPOL Annex III, creating a specific code, or acquiring additional data). The Working Group was therefore tasked with developing a detailed comparative table of the proposals, analyzing their advantages, disadvantages, and impacts on the supply chain and transportation costs, in order to provide a solid basis for future discussions.
2. **Pollution from Abandoned Fishing Gear.** Regarding pollution caused by abandoned fishing gear, it was decided to include only the geographic location of the loss in the mandatory reporting, while the time and cause remain optional. The exclusion of data that would allow the identification of the fishing vessel was also confirmed, in order to ensure its anonymity.
3. **Black Carbon (BC) Emissions.** The topic of black carbon (BC) emissions was kept on the agenda for an additional two years. Some States highlighted the technical complexity of the issue, while others emphasized the need for a holistic approach to the concept of "polar fuels" or simply requested additional time for research and the acquisition of new scientific data.

Scrubber Wastewater and Wastewater Discharge

1. **Scrubber Wastewater** On the issue of wastewater release from onboard scrubber systems into the aquatic environment, the Plenary was divided into two main positions:
 - o **First Block (Arab States, China, and others):** In favor of focusing solely on amending the existing voluntary guidelines, delegating any restrictive rules to individual national maritime administrations, to avoid sending conflicting messages to the industry.
 - o **Second Block (European States and NGOs):** In favor of instructing the GESAMP expert group to restrictively review the rules for wastewater release, while still protecting, through a transitional regime, ships that have acted promptly by installing such systems (so-called early movers).
2. **Revision of MARPOL Annex IV (Wastewater)** The discussion on the revision of MARPOL Annex IV and the guidelines for monitoring sewage treatment plants (STPs) was also postponed to the thirteenth session of the PPR. Almost all States, with the exception of European ones, expressed the need to avoid the retroactive application of the new performance standards to existing STPs, limiting them to newly installed plants only. Retroactive application was deemed unfair, confusing for stakeholders, and placing an excessive financial burden on operating ships.

Other Technical Points

- **Pre-washing of Viscous Products:** The European proposal to develop an improved pre-washing procedure and extend the requirements to additional products for the efficiency of pre-washing procedures (MARPOL Annex II) was supported. However, some stakeholders (such as IPTA and ICS) expressed concerns regarding the availability of the necessary port facilities and the potential implications for emissions. However, given the significant positive environmental effects, the discussion was postponed to the relevant Working Group.
- **Bilge Water (IOPP):** In the context of the review of the IBTS Guidelines and the International Oil Pollution Prevention Certificate (IOPP), no consensus was reached on either proposal regarding the forced evaporation of oily bilge water. States were invited to develop a new consolidated proposal for submission to PPR 13.

2 The work of the Committee on the London Convention and the London Protocol

The 47th meeting of the Contracting Parties to the London Convention (LC) and the 20th meeting of the Contracting Parties to the London Protocol (LP) were held from October 27 to 31. To date, 87 States have ratified the LC, while 56 have also ratified the LP.

Technical Cooperation and Compliance

The Committee analyzed in detail the technical cooperation activities of the London Protocol, focusing in particular on initiatives aimed at removing obstacles to State compliance. These efforts include the development of new reporting guidelines, the analysis of regional barriers, and improving the linguistic and digital accessibility of LC/LP materials. In this context, the training workshops organized by the Secretariat in Colombia, Kenya, Guatemala, and Iraq were highlighted.

Marine Geoengineering and the Precautionary Approach

A large section of the meeting was dedicated to analyzing the intersessional work of the legal group, in which Italy participated. The focus remained on the 2013 amendments and the analysis of marine geoengineering techniques, including increasing ocean alkalinity, the use of reflective microbubbles and marine cloud brightening, as well as the cultivation of macroalgae for CO₂ capture. The Italian delegation emphasized the need to maintain a rigorous precautionary approach, given the persistent scientific uncertainty regarding the potential environmental consequences of these techniques. The Plenary expressed the hope that the debate on marine geoengineering can be based on solid and transparent scientific foundations.

International Positions and Oppositions

- **Geological Storage of CO₂ (LP Amendments):** The Italian delegation shared with the Committee the excellent preliminary results obtained from the experimental project for CO₂ segregation in depleted offshore gas fields, conducted in Ravenna, which is about to enter Phase 2.
- **Climate References and the Paris Agreement:** The United States delegate addressed the Committee, requesting that references to climate change and the Paris Agreement be removed from the agenda items. This request was rejected by the Plenary.
- **Marine Plastic Pollution:** The Secretariat proposed updating the IMO Action Plan to adopt a methodological approach based on the type of substance, in line with the MARPOL and Basel Conventions.
- **Fukushima Water Management:** In the context of the discussion on radioactive waste management, South Korea and China reopened the issue of Fukushima waters, calling for greater transparency in the sharing of data and sampling methods. Japan responded by confirming full disclosure of the data, monitoring conducted with the collaboration of third-party and international experts, and the radioactivity levels, which are well below the limits set by international regulations. The United States, the United Kingdom, France, Monaco, and Spain expressed their support for Japan's position.

3. Italy's role in the Maritime Safety Committee (MSC)

The 110th meeting of the Maritime Safety Committee (MSC 110) was held at IMO Headquarters from June 18 to 27.

In his opening address, the IMO Secretary-General emphasized the complex global geopolitical situation and transnational challenges to maritime security, citing phenomena such as piracy, armed

robbery, organized crime, and illicit trafficking of weapons and persons. He also praised the success of the MASS Symposium, organized by Norway in view of the upcoming regulatory development..

Security and Geopolitics

1. **Nuclear-Powered Vessels:** The need to update the 1981 Code for Nuclear-Powered Merchant Vessels was discussed, focusing the review exclusively on safety aspects. A proposal was approved to submit the regulatory review for nuclear-powered merchant vessels (including icebreakers) and floating nuclear power plants to the GHG working group, in cooperation with the International Atomic Energy Agency (IAEA).

2. **Incident off Libya:** The Dutch delegate reported an incident involving one of their container ships on June 2, which was boarded by Libyan Arab Armed Forces military personnel 17 miles off Benghazi. The boarding occurred for an alleged violation of a restricted area off Derna. It was emphasized that information on this prohibited zone is not disseminated through official channels (Navtex, VHF, nautical charts), in clear violation of the SOLAS Convention. The vessel was fined €35,000 under threat of gunfire.

3. **GMDSS Disconnection:** In the analysis of NCSR 12, the Russian delegate again raised the issue of Russian vessels' disconnection from the GMDSS and INMARSAT services as a result of the sanctions, asserting that this jeopardizes safety and violates the principle of freedom of navigation.

Autonomous Ships (MASS) and Regulatory Framework

Continuing the development of a non-mandatory Code for MASS vessels, the Committee finalized several chapters of the draft (6, 9, 10, 11, 16, 17, 18, 19, 22, 23, 24, and 25), although it removed Chapter 13 (Radiocommunications) to avoid duplicating requirements already established by SOLAS. Discussion of Chapter 15 (Human Element) was postponed to the next ISWG. Regarding Chapter 23 (SAR), the principle that the presence of a crew on board implies the presence of the Master was consolidated.

The Italian position, in line with the European one, supported finalizing the Code at this session, avoiding reopening chapters already defined. Argentina reiterated its reservation to regulate MASS vessels with national legislation. A roadmap has been established, with the non-mandatory Code expected to be adopted in 2026 and the mandatory Code in 2032, followed by an experience-gathering phase. Cybersecurity will be the subject of a holistic review of the entire Code.

Decarbonization and Emerging Technologies

1. **Safety for Alternative Fuels:** The Correspondence Group encountered difficulties in developing recommendations to address the 14 regulatory gaps identified for new fuels (HTL, pyrolysis, FT diesel) and lithium-ion batteries. An ad hoc Working Group defined the details for updating the Interim Guidelines for the Safety of Fuel Cell Vessels (MSC.1/Circ.1647) and identified the relevant Committees to address regulatory barriers for each fuel.
2. **"One Ship, One Code" Policy:** To implement this policy when gas carriers use their cargo as fuel, a compromise was reached: to update the SOLAS Convention and make guidelines for the various fuels mandatory. Ships subject to the IGC Code that use fuels not included in Chapter 19 will have to comply with the mandatory guidelines.

IT Security and Other Legal Issues

- **Revision of the Cyber Guidelines:** A goal-based approach for the development of cybersecurity standards was agreed upon. The future non-mandatory Code must be agile, flexible, and non-prescriptive, to adapt to evolving threats. Initial voluntary requirements for ships and port facilities and dedicated specialization courses have been established.
- **Unified Interpretations (UIs):** The Committee reiterated that UIs must comply with the three "safeguards" and can only be considered IMO UIs if submitted through a formal document. UIs proposed by Recognized Organizations (ROs), such as IACS, can only be "noted."
- **Fiber-Reinforced Plastics (FRP):** The focus on FRP output has been limited to fire prevention and non-load-bearing structures.
- **Interpretation of the "Lower Part":** Regarding the interpretation of the "lower part" of a ship (the subject of lengthy discussion at SDC 11), the Committee proposed a short-term circular directing PSC programs to accept the requirements defined by flag states, pending a long-term solution that could revise SOLAS regulation II-2/13.
- **Revision of the STCW Convention:** Intersessional work was approved to complete the full revision of the STCW Convention and the related Code within the expected timeframe, with the addition of a dedicated technical officer at IMO.

Miscellaneous and New Outputs

- **Italian Proposal (Recovery of Bodies):** The proposal to amend the draft guidelines for the recovery of bodies at sea, submitted by Italy to MSC 109, which includes an explicit reference to the flag state, was approved.
- **Rules of Procedure:** The Committee's Rules of Procedure have been revised and updated to align them with those of the Council regarding hybrid meeting capacity and voting transparency rules.
- **New Approved Outputs:** New work approved includes the development of a minimum performance standard for the alternative PNT system called R-mode (for NCSR), the comprehensive and holistic revision of the Casualty Investigation Code (for III), and the lowering of the speed requirement for fast rescue vessels (for SSE).
- **Miscellaneous Topics:** The Canadian proposal on the use of thermal imaging cameras in fire prevention, the need for further human-centered design (HCD) were considered, and the challenges in implementing the Polar Code were noted. The IMO was also informed of the creation of an international advisory body on the resilience of submarine cables (ITU).

3.1 The work of the SDC Subcommittee

The eleventh session of the Subcommittee on Ship Design and Construction (SDC 11) was held in January 2025. The meeting was attended by staff from the Maritime Office of the IMO, officers from the General Command of the Port Authority Corps – Coast Guard, and representatives of national stakeholders.

Focus on Underwater Noise Pollution (URN)

A significant portion of the agenda was dedicated to analyzing experiences with reducing underwater noise radiated by shipping (URN). These activities, initiated with the October 2023 guidelines, are currently halfway through the URN Action Plan, according to which the IMO:

- Is acquiring data, studies, and experience related to URN in areas ranging from ship design, technical aspects, maintenance, operational management, energy efficiency, incentive systems, and training.
- Continues to fund studies to estimate global URN emissions.
- Organized a second Expert Workshop on URN in October 2025 to facilitate knowledge exchange.

Among the most cutting-edge initiatives is the "GloNoise" project, funded by GEF-UNDP-IMO, which operates at global, regional, and local scales. The project focuses on developing technical guidance for noise mitigation, providing capacity building, promoting networking with strategic partners, conducting risk assessments, and defining best practices for URN reduction.

Normative Work and Technical Reviews

The Subcommittee actively continued its work on several topics of technical and safety relevance: Post-Accident Capability Assessment: Circular MSC.1/Circ.1369 concerning interim explanatory notes for assessing the capabilities of passenger ship systems after fire or flooding was revised, with particular attention to the timing criteria for system restoration, the return journey to port, and operational aspects.

- **Amendments to the ESP Code and Remote Inspections:** The revision of the 2011 ESP Code (Enhanced Survey Programme) was discussed in relation to the use of Remote Inspection Techniques (RIT). The Italian delegation, supported by the European Commission and the International Transport Workers Federation (ITF), emphasized that the application of RIT must be subordinate to the development and priority approval of guidelines agreed upon by the IMO. Italy also offered its availability to present its state-of-the-art facility in Genoa for testing these new techniques.
- **Propulsion and Steering Systems:** The deadline for the completion and entry into force of the amendments to SOLAS requirements for propulsion and steering systems (traditional and non-traditional) has been extended until 2032.
- **Emergency Towing Appliances:** In developing interim guidelines for emergency towing appliances for vessels other than oil tankers, an approach combining two studies (the Japanese one, based on linear coefficients, and the Chinese one, based on initial incremental increases) was chosen, adopting the higher value resulting from the two coefficients.
- **Industrial Personnel Code (IP Code):** Work continued on the consistent application of industrial personnel weight in ship stability calculations.
- **Updated Guidelines:** Changes have been made to the interim guidelines for the use of Fiber Reinforced Plastics (FRP) and the guidelines for the construction, installation, maintenance, and inspection of embarkation and disembarkation equipment, with particular attention to defining the ISO standards applicable to ladders and gangways.
- **Load Line Protocol:** Amendments have been made to the 1988 Load Line Protocol regarding the sag limits of chains when used in place of fixed guardrails on ship decks.

3.2 The work of the HTW Subcommittee

The eleventh meeting of the Subcommittee on the Human Element, Training and Watchkeeping (HTW 11) was held at IMO headquarters from February 10 to 14.

The comprehensive review of the STCW Convention and its Code occupied much of the Subcommittee's work. Specifically, over 35 proposed amendments were analyzed regarding: seafarer competencies; use of simulators; development of training courses for ships using alternative fuels; detailed analysis of identified gaps in the Convention; and integration of IMSAS with the STCW supervision system.

The relevant working group finalized Phase 1 of the review, with over 500 gaps to analyze. Phase 2 will continue through dedicated working groups (ISWG-STCW) and will address proposed amendments related to individual tables of the Convention.

Consequently, the roadmap was extended until 2031. Specifically, European delegates, after numerous coordination meetings, insisted that the review timeframe be maintained within five years. Regarding the development of non-mandatory guidelines for seafarers serving on ships using new technologies and alternative fuels, the Italian delegation supported the European proposal to create a single interim guideline covering all types of alternative fuels. Furthermore, it offered its expertise regarding training standards for battery energy storage systems and fuel cells. Other states, however, proposed differentiated guidelines for each individual alternative fuel or new technology.

The compromise reached during the plenary session was to work in parallel on generic guidelines (more rapid to respond to the urgent needs of the industry) – to be approved by the next Committee on Maritime Safety – and specific guidelines (more precise but requiring more time for full development), developing them through correspondence groups and according to the following order of priority: ships powered by methyl amyl alcohol and ammonia; ships powered by fuel cells, LPG, hydrogen, and batteries.

The report on model courses ready for validation during the upcoming meetings of the Subcommittee on the Human Element, Training and Watchkeeping (HTW 11-12-13-14) was analyzed. In this regard, the Secretariat lamented the general lack of expert participation in the relevant intersessional working groups and therefore invited Member States to nominate experts for future sessions.

Regarding the human element of autonomous vessels and the Russian document proposing adjustments to seafarers' IT skills and general knowledge, the plenary recalled that during the last Maritime Safety Committee (MSC 108), it was established that knowledge, understanding and proficiency (KUPs) would be defined by the Subcommittee on the Human Element, Training and Watchkeeping only following the finalization of the Code for Autonomous Vessels (MASS).

Finally, with regard to the analysis of the data in the Secretariat's possession on cases of issuance of The plenary session emphasized the need to maintain high levels of vigilance regarding illegal certificates of competence. In this regard, several states (France, the Netherlands, Ireland, and the Philippines) shared their findings, the investigative efforts undertaken, and the results obtained, with the aim of encouraging further efforts to combat this activity by other states as well.

3.3 The work of the SSE Subcommittee

The eleventh meeting of the Subcommittee on Ship Systems and Equipment (SSE 11) was held at IMO headquarters from February 24 to 28.

The first major topic discussed was fire prevention.

Work continued on a non-mandatory circular for atmospheric oil mist detectors, with the specific exclusion of alternative fuels, for which safety standards are being drafted as decided by the MESC.

The plenary session supported the revision of the FTP (Fire Testing Procedures) Code to allow for new fire protection systems and materials, including plastic pipes and related construction requirements, as proposed in a document presented by the European delegations.

The guidelines on fire containment (SOLAS II-2/9) were updated to clarify ambiguities and improve their implementation.

Regarding the amendments to Chapter II-2 of the SOLAS Convention and the Fire Fighting Systems (FSS) Code for container ships, particularly those carrying battery-powered vehicles, the Committee examined the possibility of using Artificial Intelligence (AI)-based Video Fire Detection Systems (VFDS) as the primary detection system.

Finally, the Committee focused on analyzing the adequacy of fire protection, detection, and extinguishing devices in ro-ro spaces, with the aim of mitigating the risk of fires originating from vehicles powered by new technologies.

In this context, the use of Artificial Intelligence (AI)-based Video Fire Detection Systems (VFDS) was analyzed. While approving the continued discussion of this technology, the creation of an explicit regulatory requirement was ruled out for the time being due to the lack of sufficient data on the use and reliability of these systems.

In parallel, the following were discussed:

- The use of advanced technologies capable of providing more accurate and comprehensive data for fire risk analysis.
- The need to define appropriate and standardized terminology for fires specifically related to electric vehicles.

Harmonization of Definitions

Countries with a significant LSA industry, such as Turkey, have raised interpretative issues regarding the inconsistency and ambiguity in the definitions of "brand" (manufacturer) and "type" (category of equipment). Such ambiguities, as currently worded, risk disconnecting the original manufacturer from independent service providers, introducing potential safety risks.

The Italian delegation, in line with European coordination, proposed, with broad support in the plenary, adopting the scope defined, for example, by the EU marine equipment regulation, where "type" is intrinsically linked to a specific original equipment manufacturer and a defined technical design. It was therefore agreed on the need to further refine the definitions of "brand," "type," "model," and "series" to ensure internationally harmonized interpretation and implementation.

Regulatory Review and New Proposals

Work continued on the revision of Chapter III of the SOLAS Convention and the LSA Code, along with the development of design requirements for release systems for free-fall lifeboats. For the latter, the safeguard of non-retroactive application was established, with entry into force scheduled for January 1, 2031, for new ships.

The Plenary accepted two proposals from China:

1. The implementation of new requirements for ventilation of partially enclosed lifeboats.
2. The introduction of covered self-righting or reversible liferafts on all new passenger and cargo ships, providing for transition periods of three and five years, respectively.

The proposed amendments regarding the fire resistance of lifejackets and the load testing of lifeboats were postponed to a new and specific output.

Finally, the proposed "Unified Interpretations" (UIs), the validation of training course models, updates to ISO standards for lifeboats, and the thermal performance of immersion suits were analyzed.

3.4 The work of the NCSR Subcommittee

The twelfth meeting of the Subcommittee on Navigation, Communications, and Search and Rescue (NCSR 12) was held at IMO Headquarters from May 13 to 22.

EU states proposed amendments to the current European Ship Reporting Systems (SRSs) to include the requirement to provide information on marine insurance.

This amendment aims to improve the monitoring of maritime traffic and strengthen the protection of the marine environment. Recent EU data show that up to 22% of monitored ships did not provide proof of insurance, posing a serious risk in the event of an accident and making the amendment urgently needed.

The proposal encountered strong resistance from Russian and Chinese delegates, citing technical yet instrumental arguments tied to the political issue of the "dark fleet." The issue is part of the recent Russian declaration of May 21 at the UN Security Council against EU states acting as pirates in the Baltic Sea (<https://www.lloydslist.com/LL1153584/Russia-lashes-out-at-Nato-pirates-as-UN-addresses-escalating-maritime-security-concerns>).

In particular, the objections concerned technical and procedural aspects, such as:

- means of transmitting the insurance certificate;
- proposed substantial and not minor changes;
- procedural concerns;
- doubts related to the cited international conventions, which concern civil liability and not the protection of the marine environment;
- possible conflicts with the principle of freedom of navigation;
- increased administrative burden for ships.

In an effort to reach a compromise and address the objections raised, the European Union member states proposed solutions, including the temporary exclusion from the analysis of certain Ship Reporting Systems (SRSs), including that of the Strait of Bonifacio (BONIFREP). This position is consistent with the work the Italian Coast Guard is already conducting with its French counterparts, with whom it shares management of the SRS, for a complete revision of the now outdated Resolution that established the system. The discussion, particularly lively and for the first time characterized by a more political than technical tone, even within the dedicated expert group, was reflected in the Plenary. There, the Russian Federation delegate requested a roll-call vote, an extremely rare practice in a technical subcommittee.

After a discussion on the procedural rules to be applied, a vote was taken on whether to close or continue the discussion. With 24 votes in favor and 3 against, the debate was closed and the decision to send the proposal to MSC 111 for final approval was confirmed.

The same topic included the approval of the amendments proposed by Italy and the other Adriatic States to the ADRIREP ship reporting system.

Regarding the progress made on the VHF Data Interchange System (VDES), the Subcommittee drafted an MSC resolution to amend the SOLAS Convention accordingly.

The technical, operational, and cybersecurity challenges of the transition to S-100 ECDIS were discussed. The plenary session endorsed the working group's considerations regarding how the framework should enable secure and standardized IP-based data exchange between shore-based facilities and ships, supporting real-time meteorological and navigation data. EU Member States drew attention to the content overlap between some S-100 products and maritime safety information (MSI) within the Global Maritime Distress and Safety System (GMDSS), as well as the current limited transmission capacity and uncertain bandwidth requirements, which require further investigation. After extensive discussions on the use of privately or publicly operated Maritime Connectivity Platforms (MCPs), along with the potential impacts and associated costs, it was concluded that MCPs should be hosted by coastal States or authorized organizations/entities to ensure that maritime services are provided from official and authenticated sources, and without additional charges.

Software Maintenance and Electronic Publications

The Guidelines for Software Maintenance of Onboard Navigation and Communication Equipment and Systems have been finalized. The objective is to improve the efficiency, effectiveness, safety, and security of onboard software maintenance by ensuring it is conducted through a standardized, controlled, and transparent process. These guidelines will be submitted to MSC 111 for approval.

Furthermore, the results of the work of the group dedicated to developing guidelines for the use of Electronic Nautical Publications (ENP) were discussed.

Radionavigation and Augmentation Systems (WRNS).

Regarding the procedures and requirements for the recognition of augmentation systems in the World Radionavigation System (WRNS), a new Resolution was presented to replace the current Resolution A.1046(27), aligning it with current procedures and requirements.

The maritime community uses various augmentation systems (land-based and satellite-based), particularly Radiobeacon Differential GNSS (DGNSS), SBAS (Satellite Based Augmentation System), and RAIM (Receiver Autonomous Integrity Monitoring). Other systems, such as PPP (Precise Point Positioning) and Advanced RAIM, are under development. The Italian delegation expressed support for the first proposed option.

Updates and Technical Reports

The following reports and developments were analyzed:

- The outcomes of the twentieth Joint IMO/ITU Experts Group on Maritime Radiocommunications.
- The outcomes of the IMO Enhanced Group Call Coordinating Panel.
- The report of the NAVTEX Coordination Panel regarding changes to the GMDSS system.
- Proposed amendments to the NAVDEX Manual and the NAVDAT Manual.
- Amendments to the SOLAS Convention regarding the circulation of Maritime Safety Information (MSI).
- Validated training course templates.

SAR Harmonization and Regulatory Review

As part of the processes aimed at harmonizing maritime and aeronautical procedures and amending the IAMSAR (search and rescue) Manual, the following were analyzed:

- The report of the Joint IMO/ICAO Working Group.
- The draft guidelines for the inclusion and updating of search and rescue information in the global SAR plan.
- The analysis for the review of the adequacy and effectiveness of SOLAS Regulation V/7.3 (search and rescue services).
- The identification of obsolete content within Resolutions A.225(VII) and A.616(15), referred to in SOLAS Regulation V/7.1.

Satellite Service Providers and Risks for the GMDSS

The 2024 annual reports of the GMDSS-recognized mobile satellite service providers (INMARSAT and IRIDIUM) were analyzed. In this context, the Director of the IMSO (International Satellite Monitoring Organization) drew attention to the entry of new players (such as Starlink) into the satellite communications market.

The IMSO highlighted the risks associated with an open and unregulated product offered at competitive prices, including the potential overload of the L-band (maritime services) and the lack of adequate reliability features necessary to meet the safety of human life at sea requirements, which are instead guaranteed by the current accredited providers (INMARSAT and IRIDIUM).

LRIT and Dark Fleet Updates

- **Procedures and Administrative Burdens:** New testing procedures and procedures for updating information on national contact points for LRIT matters have been approved. The goal is to simplify procedures and reduce administrative burdens by delegating implementation directly to Member States without the involvement of the Secretariat.
- **Dark Fleet and Monitoring:** IMSO has submitted a feasibility study on the analysis of LRIT data to identify vessels that are not transmitting navigation data, in order to combat the phenomenon of dark fleets. IMSO has expressed its immediate willingness to collaborate on prompt reporting. Given the complexity of the changes, analysis of the proposal to integrate LRIT with satellite AIS and the integration of the satellite communication capabilities of modern smartphones into the GMDSS will require the inclusion of a dedicated new item on the agenda.

Optimizing the NCSR Subcommittee's Workload

Regarding the MSC's request to reduce the NCSR Subcommittee's workload from ten to eight/five days, the majority of Member States expressed concerns. They justified their position by emphasizing that the NCSR was born from the merger of three Subcommittees, addresses new technological challenges, and works on fundamental tools for maritime security governance.

Despite the objections, the Secretary-General emphasized the unsustainability of the current workload, both in terms of mission costs for delegations and Secretariat staff. He also announced that the financial forecast to be presented to the next Council already includes a five-day NCSR duration. Several possible solutions to optimize the sessions were therefore analyzed:

- Early release of working groups and experts based on draft Terms of References (ToRs).
- Moving some agenda items to intersessional sessions.
- Revise procedures for analyzing changes to ship routing systems.
- Reduce the length of reports.
- Reduce bulky documents submitted by Member States.

3.5 The work of Subcommittee III

The eleventh meeting of the Subcommittee on the Implementation of IMO Instruments (III 11) was held at IMO Headquarters from May 13 to 22.

Harmonization and Port State Control (PSC) Procedures

The Subcommittee devoted extensive analysis to measures aimed at harmonizing Port State Control (PSC) procedures, especially with regard to security standards. The outcomes of this work were sent to Assembly 34 for adoption.

Recent changes to the PSC Memorandums of Understanding (MoUs), performance data, and ship detention statistics were noted. Furthermore, the Subcommittee approved the enhancement of the current PSC module on the GISIS database to make it more efficient, responsive, and user-friendly, including through the introduction of a web service (ODB).

Mandatory Interpretations and Relationships between States

The PSC's obligation to comply with legitimate interpretations of mandatory provisions provided by flag States was discussed, reaffirming the respective powers and obligations of flag States and port States established by IMO instruments. Two approaches were proposed:

1. Port State Control Officers (PSCOs) should, in principle, accept the design provision approved by the flag State and refrain from adopting control measures based on their own interpretation of the requirements.
2. Implementation should be in strict compliance with the relevant provisions of the relevant international conventions.

In this regard, it was decided to await the outcome of SDC Subcommittee 12 (Ship Design and Construction) regarding the interpretation of the controversial term "lower part" of the ship.

Working Hours and PSC Review

Regarding the issue that arose from the analysis of two studies with conflicting results regarding working hours and rest periods, the Subcommittee reaffirmed the Flag State's full responsibility to ensure compliance with the work-rest cycle, as well as the PSCs' full responsibility to conduct any necessary checks. Finally, it was agreed to initiate a review of PSC procedures, with the aim of providing input to the Subcommittee on the Human Element (HTW) and in collaboration with the IMO/ILO Working Group. Model Course 3.09 on PSC was also revised.

Measures to Combat Plastic Pollution

As a follow-up to measures to combat plastic pollution from ships, the Subcommittee agreed to recommend to the MEPC that a circular be drafted to encourage Member States, in their capacity as flag and port States, to improve the implementation and enforcement of MARPOL Annex V (on waste) on fishing vessels.

Development of Guidelines and Audit Tools

- **Harmonized System of Inspection and Certification (HSSC):** During the discussion of the updated guidelines for HSSC investigations, a proposal to amend them to avoid excessively extending the timeframe for correcting deficiencies was discussed. The Chair invited the proposing State to submit a draft text to the next Subcommittee.
- **Regulatory Review and Gaps:** The correspondence group continued its work to update and revise the guidelines and identify gaps to be filled, such as the creation of an adequate framework for surveys on the implementation of the Hong Kong Convention (HKC), which recently entered into force.
- **IMO Obligations:** The provisions to be considered for amending the non-exhaustive list of obligations arising from the relevant IMO instruments (III Code - Resolution A.1187(33) were analyzed).
- **Remote Audits:** The Subcommittee agreed to establish a Working Group to prepare draft guidelines regarding the assessment and application of remote inspections, ISM Code audits, and ISPS Code verifications.

Unified Interpretation of Inspections

The proposal for a unified interpretation of the "inspection completion date" provided for in MSC-MEPC.5/Circ.3 was analyzed. Initially, the need for further discussion was highlighted, particularly for cases where an inspection (annual, additional, intermediate, or periodic) is completed before the specified period. With the clarifications provided by the proponents, the Subcommittee ultimately approved the interpretations.

Casualty Analysis and Navigation Safety

- **Assessment of Investigations:** Lessons learned and navigation safety issues identified by a dedicated working group were analyzed. They examined the results of 39 maritime accident investigation reports.

Compliance Tools and IUU Fishing

- **Port Waste Collection Facilities:** The annual report on reports on the status of port waste collection facilities was analyzed. In this regard, it should be noted that no Italian collection facilities are listed.
- **IUU Fishing and Cooperation:** The report of the joint FAO/ILO/IMO working group on Illegal, Unreported and Unregulated Fishing (IUU Fishing) was analyzed. The idea of greater cooperation between Port State Control (PSC) regimes and the Port State Measures Agreement (PSMA) was welcomed. However, several States emphasized the importance of maintaining a clear separation between the two regulatory systems.

3.6 The work of the CCC Subcommittee

The eleventh meeting of the Subcommittee on Transport and Containers (CCC 11) was held at IMO headquarters from September 8 to 12, 2025.

Alternative Fuels and Decarbonization

The Subcommittee focused much of its work on regulations relating to low-flammability and alternative fuels:

- Amendments to the IGF Code (International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels) and the IGC Code (International Code of the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk) were discussed.
- Guidelines on the use of hydrogen as a marine fuel were developed and finalized.
- In accordance with instructions received from MSC 110, a work program was developed on all other safety measures associated with the use of alternative fuels and low-greenhouse gas (GHG) emission technologies.
- The revision of the guidelines associated with the IGC Code for the carriage of hydrogen on board merchant ships and the guidelines associated with the IBC Code (International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk) for the use of ammonia as both cargo and fuel were discussed.

Cargo and Container Security

- **Lashing Systems:** The guidelines on ship lashing systems and devices (MSC.1/Circ.1353/Rev.2) have been amended to include technical operating standards for operations management software.
- **Container Loss:** Issues related to reducing the risk of container loss at sea and the resulting notification procedures to coastal and flag states were discussed.

Dangerous Goods Codes

- **IMDG Code:** Progress has been made in developing several amendments to the IMDG (International Maritime Dangerous Goods) Code. The specific details of these changes will be finalized by E&T Group 43 (Editorial and Technical Group), scheduled for the week of September 15–19, 2025.
- **IMSBC Code:** Most of the new proposals for solid bulk dangerous goods schedules, to be included in the International Maritime Solid Bulk Cargoes Code (IMSBC), have been deemed valid.

4. The simplification process in the maritime sector carried out within the FAL Committee

The FAL Committee, which met in March 2025, began its work by updating its Rules of Procedure to align them with those of the Council, including capabilities for hybrid meetings and rules on voting transparency (particularly the definitions of "members present" and "members present and voting").

Security and Screening Measures

1. Passenger Data Requirement (API/PNR): Amendments to the FAL Convention have been proposed to introduce the requirement to provide Advance Passenger Information (API) and Reservation Information (BRI/PNR) for ships, for preventive screening purposes by maritime and border authorities. While no critical issues were identified regarding the BRI/PNR, Italy supported the proposal regarding the API, provided that it does not create double reporting obligations for the shipping operator, in accordance with the "submit once" principle.

2. Drug Smuggling: Gaps have been identified in the guidelines for the prevention and suppression of narcotic drug and psychotropic substance smuggling on ships engaged in international traffic. Work will continue through a correspondence group.

Facilitation for Seafarers (Key Workers)

Regarding amendments to the FAL Convention regarding provisions regarding seafarers as "key workers" during a public health emergency of international concern, proposals consistent with ILO recommendations and UN Human Rights Council resolutions were considered. Reference was also made to national responsibility for vaccination plans and related access priorities, supporting supply chain stability in times of crisis. Work on this topic will continue in a joint IMO/ILO/WHO working group.

Digitalization and Administrative Simplification

1. Maritime Single Window (MSW): China's proposal to include an automatic check function in the Maritime Single Window (MSW) architecture to reduce manual verification times was accepted. This implementation was approved provided it does not conflict with the system's decentralized structure. The Italian delegation confirmed that it has already strengthened data quality measures to reduce human error, in collaboration with the National Institute of Statistics, and that the MSW implementation in Italy is well underway.

2. **Digital Strategy and Cybersecurity:** The intention to develop a comprehensive maritime digitalization strategy, including maritime transport contracts and cybersecurity, was confirmed. There was broad support for the revision of the guidelines on maritime cyber risk management.

3. **Electronic Certificates and Digital Identity:** The joint FAL-LEG-MEPC-MSC guidelines on electronic certificates were approved. The Italian delegation supported the proposal, **emphasizing** the usefulness of having an internationally recognized digital identity for key workers, globally interoperable and reliable, to facilitate interaction with all Maritime Single Window systems.

4. **Autonomous Vessels (MASS):** The proposal to create dedicated FAL declarations for autonomous vessels was postponed until after the MASS Code was approved.

Guidelines for Staff Responsible for Berthing

A document co-sponsored by Italy proposed revising the Guidelines on minimum training and education for berthing personnel, along with a draft FAL resolution as the appropriate instrument for approval. Not only training courses for new hires but also periodic refresher courses for existing personnel were included.

Unsafe Mixed Migration and the Role of the Flag State

Regarding the issue of "unsafe mixed migration," the Italian delegation presented an agreed-upon document to further specify the role of the flag state of merchant vessels recovering bodies during search and rescue (SAR) operations. The discussion was referred to MSC 110, as the Committee responsible for flag state matters. The Italian delegation conducted a consultation and compromise process, taking into account the concerns expressed by some States, with the aim of obtaining co-sponsorships and achieving rapid consensus approval of the guidelines.

5. *Technical cooperation (TC).*

Technical Committee 75 (TC 75), which met in June 2025, addressed numerous crucial issues for maritime safety, technical cooperation, and capacity building in the maritime sector.

Capacity Development Strategy (2021-2030)

Regarding the development of the Capacity Building Strategy for the 2021-2030 period, the Italian delegation actively participated in the working group, securing the inclusion of specific references to regional and local training institutions within the "Capacity Development Strategy," both in the "implementation" and "training and education" sections.

The "Capacity Development Strategy" document was approved by TC 75 and will be forwarded for Council recommendations and final approval by the Assembly. The Secretariat is now tasked with developing a detailed document for implementing this strategy, based on the guidelines that incorporated the amendments suggested by the Italian delegation.

Controversy over National Training Institutes

During the discussion of the annual summary of the activities of the IMO's global maritime training institutes (World Maritime University - WMU and International Maritime Law Institute - IMLI), the

Secretariat expressed its appreciation for the work carried out by the IMSSEA (Istituto Superiore di Studi Marittimi).

Subsequently, the Italian delegation intervened to inform the Committee of the IMO's unilateral decision to terminate the Memorandum of Understanding (MoU) in force with the IMSSEA. The delegation highlighted the added value provided by the highly technical courses offered by the Italian institute, their accessibility, their affordable cost, and their complementarity with the academic activities of the WMU and IMLI. Despite the explanations provided by the IMO Secretary General, numerous countries, both participants and non-participants of IMSSEA courses, supported the Italian position. France also raised a similar issue regarding its own IPER Institute, whose MoU was similarly finalized.

The Compromise Reached

Initially, the Italian delegation had prepared a document to submit to the next Council to formally raise the issue, garnering broad informal support for potential co-sponsorships. At the same time, an open dialogue was maintained with the Secretariat to seek an acceptable compromise, in line with the IMO's collaborative spirit.

Bilateral meetings held on the sidelines of TC 75 with the French delegation, the Director of the Technical Division, and the Rectors of WMU and IMLI led to the following agreement:

- The IMO is no longer in a position to directly fund training institutions other than WMU and IMLI due to financial and human resource limitations required to conduct adequate validation, certification, and oversight activities for courses provided by third-party institutions.
- National training funds may be channeled through the IMO, under the Integrated Technical Cooperation Programme (ITCP), and then transferred, minus administrative costs (5% to 10%), directly to IMLIs and WMUs.
- In order to benefit from the allocated national funds, national training institutions may in turn enter into additional MoUs with WMUs and IMLIs to define the detailed rules for cooperation and the joint delivery of training courses.

The above represents the best compromise achievable, given the sensitive nature of the issue.

According to the Italian delegation's observation, particular attention must be paid to the careful drafting of any MoUs between national training institutions and WMUs/IMLIs. In this context, the key points relating to the Capacity Development Strategy (described in paragraph 3) provide a solid basis for framing such agreements, the drafting of which is left to the discretion of the parties. Should any critical issues emerge from monitoring the proposed solutions, the Italian delegation, in agreement with the French delegation, reserved the right to present them during TC 76.

6. The legal aspects addressed within the Legal Committee (LEG).

Legal Committee (LEG): Actions Against Dark Fleets and New Responsibilities

The IMO Legal Committee (LEG) meeting, held in March 2025, addressed crucial issues for global maritime governance, ranging from safety and security to seafarer protection and international law.

Combating Dark Fleets and Fraudulent Registration

1. **Request for Regulatory Scoping Exercise (RSE):** The fight against dark fleets and fraudulent ship registration has occupied a large part of the agenda. Italy, along with other European states, has requested the creation of a dedicated working group to conduct a regulatory scoping exercise (RSE). The objective is to develop a roadmap of actions, including more restrictive regulations for granting IMO numbers and measures against fraudulent registrations, to be approved during the next Legal Committee meeting (LEG 113).

2. **Support and Terminology:** The proposal received considerable support (including from the United Kingdom, the United States, Japan, Korea, Brazil, Turkey, and numerous trade associations), citing the limited effectiveness of national action on a phenomenon of this magnitude. It was noted that, to avoid fueling irrelevant political narratives, European documents deliberately omitted the term "sanctions," preferring instead to use the term "substandard ships" rather than "dark fleet" or "shadow fleet," to better reflect the IMO's institutional competences in safety (MSC) and environment (MEPC). The World Maritime University also reported the presence of 267 false flagged ships and over 1,000 ships without flag data in the GISIS database.

3. **Approval of Output:** The Plenary approved the creation of a new specific output within the LEG Committee, developed by a working group that also defined the Terms of Reference (ToRs) for a correspondence group. The latter, following Council approval, will develop the RSE roadmap, including an assessment of the presence of relevant agenda items in the various IMO Committees, the review methodology, and a work plan for finalization in 2027.

4. **Best Practices for Registration:** The creation of a new output was approved for the development of non-mandatory guidelines containing best practices for ship registration, as a tool to combat fraudulent registers, in a holistic approach that includes more accurate and timely exchange of information.

Seafarer Protection

- **Abandonment of Seafarers and Ships:** IMO/ILO reports on cases of abandonment of seafarers by shipowners and cases of abandonment of ships in 2024 were analyzed, recording an overall increase compared to 2023. Regarding Italy, 9 cases of seafarer abandonment were reported in Italian ports. Several nations requested updates, highlighting discrepancies between the IMO/ILO database and the actual situation.

- **Fair Treatment:** The Resolution containing guidelines on the fair treatment of seafarers detained on suspicion of having committed crimes, developed by the joint ILO/IMO working group, was approved.

Adequacy and New Risks

1. **Liability for Alternative Fuels:** The inclusion of a new output in the LEG agenda regarding the adequacy of IMO liability and compensation systems for alternative fuels was approved. This exercise is part of a broader framework of ongoing activities at the MEPC and MSC Committees, which address the issue from an environmental and security perspective.

2. **Maritime Security Measures:** A new output regarding measures to manage maritime security threats was approved. The proposals include the establishment of Regional Maritime Safety Coordination Centres (RMSCCs) in strategic locations, the development of standardized protocols for cross-border pursuit, and the creation of shared databases on security threats. However, European states emphasized the need to consider the economic and administrative consequences for states.

Autonomous Ships (MASS) and Certificates

- **Legal Aspects of MASS:** The joint MSC-LEG-FAL working group identified the rules of IMO instruments that may require future amendments to address the specificities of autonomous ships. China's proposal to adopt guidelines for responsibilities, rights, and obligations related to MASS was recognized as important but postponed until after the approval of the MASS Code.

- **Fraudulent Certificates:** The European position was accepted that, while combating fraudulent certificate issuance is crucial, exchanging information on criminal proceedings is beyond the scope of the IMO. It was therefore decided to involve the Human Element Subcommittee (HTW) to consider the best measures that the IMO, within its mandate, can implement to improve systems for verifying the authenticity of issued STCW certificates, including electronic certificates.

Other Procedural Points and Issues

- **HNS Protocol 2010:** The progress made by the IMO and IOPC Funds Secretariats in promoting further ratifications and the entry into force of the HNS Protocol of 2010 was noted. Based on the declarations of States, the Convention is expected to receive an adequate number of ratifications to enter into force in 2026.
- **Rules of Procedure:** The Committee's Rules of Procedure have been revised and updated to align them with those of the Council regarding hybrid meeting capabilities and voting transparency rules.

7. In-depth analyses.

By Giuseppe SPERA, Deputy Representative of Italy to the IMO, IOPC FUNDS and IMSO.

7.1 In-depth analysis – The new IMO-ILO Guidelines for the Protection of Detained Seafarers and the IMO's Priorities: Towards Fair Treatment and the Fight against Substandard Shipping

Maritime shipping is a cornerstone of global trade, exposing seafarers—defined as "key workers"—to multiple foreign legal systems and criminal procedures. In this context, the International Maritime Organization (IMO) has strengthened the regulatory framework for the protection of seafarers through the adoption of the Guidelines on the Fair Treatment of Seafarers Held on Suspicion of Committing Crimes (TWGSHE.3/2024/5), developed in collaboration with the International Labour Organization (ILO). While non-binding, these Guidelines are an essential tool for the development of national legislation and the adoption of administrative measures consistent with the Maritime Labour Convention, 2006 (MLC, 2006). They regulate the right to due process, the presumption of innocence, protection against arbitrary and coercive detention, and the safeguarding of seafarers' economic and social rights, including wages, medical care, and repatriation. The adoption of the Guidelines is the result of the work of the Joint ILO–IMO Tripartite Working Group (TWG), established between 2021 and 2022 and approved in November 2024. It strengthens existing protection without reducing its level, establishing shared responsibility between port States, flag States, States of nationality, and shipowners.

The key principles include the presumption of innocence, the prohibition of arbitrary detention, non-discrimination, and the protection of economic rights. The port or coastal State is required to ensure compliance with the obligations of the Vienna Convention on Consular Relations, conduct fair and expeditious investigations and trials, provide clear information on the reasons for detention, guarantee access to interpreters and legal assistance, and ensure dignified detention conditions separate from other detainees. The flag State and the State of nationality must cooperate with the port State, monitor seafarers' rights, ensure the fulfillment of the shipowner's contractual obligations, and provide diplomatic, legal, and consular support, including information for family members and financial support for repatriation.

International case law has confirmed the relevance of these protections. In the M/V "Saiga" case (No. 2), ITLOS rejected Guinea's admissibility objection based on the nationality of the claims. The Tribunal held that, under the UN Convention on the Law of the Sea (UNCLOS), the flag State has full standing to act on behalf of all persons and interests on board the vessel, regardless of their nationality. This conclusion is based on the consideration that the Convention (specifically Articles 94 and 217) treats the vessel as an indivisible unit, with the flag State having the duty and right to exercise jurisdiction and control over every person involved in its operations. This interpretation is supported by the fact that UNCLOS provides for compensation for "any loss or damage" in the event of unjustified coercive measures, regardless of the nationality of the victims. The Tribunal also recognized the practical necessity of this approach, given the multinational composition of crews and the multiplicity of cargo-related interests in modern maritime transport, which would make the application of the traditional rule of diplomatic protection impractical. Furthermore, in the dispute

concerning the boarding and detention of the vessel Arctic Sunrise by the Russian Federation, it raised crucial issues regarding the protection of individual rights in interstate litigation. It has been authoritatively argued that the resolution of such disputes must not, in any way, compromise the enjoyment of the crew's fundamental rights and freedoms. It has been emphasized that the continued detention of the vessel and its crew generates irreversible consequences, since "every day spent in detention is irreversible," constituting a continuous deprivation of the seafarers' right to liberty and security. Consequently, prolonging detention pending resolution of the dispute would seriously undermine the rights of the flag State. This argument reinforces the fundamental principle of prompt release (Article 292 of the UNCLOS), establishing that coercive detention measures adopted by a coastal State must be limited and that disputes between States cannot justify detention that has irreparable effects on the human rights and individual freedom of seafarers.

The IMO–ILO Guidelines strengthen a multi-level model of protection, integrating state and private responsibilities, including those of the shipowner, orienting transnational maritime law toward the protection of fundamental rights. Managing the phenomenon of seafarer abandonment is one of the most acute crises affecting the global maritime labor sector. Subsequent amendments to the Maritime Labour Convention (MLC, 2006) have responded to this issue. The primary regulatory solution has been the imposition of Mandatory Financial Guarantees. This requirement aims to ensure that shipowners maintain sufficient financial security to cover three essential items in the event of abandonment: unpaid wages, seafarer repatriation costs, and the seafarer's necessary subsistence until repatriation is completed.

The adoption of the Guidelines comes amid an increase in seafarer abandonment and the spread of substandard shipping practices. Abandonment constitutes a serious violation of fundamental rights recognized by the 2006 MLC and ILO case law. Substandard operations compromise maritime safety, environmental integrity, and fair competition, indirectly impacting seafarers. The IMO has initiated a regulatory review process aimed at strengthening oversight measures and introducing more stringent responsibilities for operators.

In conclusion, the IMO–ILO Guidelines represent a fundamental step in protecting a global workforce exposed to unique legal risks, reinforcing the principle that investigations into alleged crimes must not result in arbitrary detention or human rights violations. Effective implementation requires the coordinated efforts of port States, flag States, States of nationality, and shipowners, ensuring that seafarers, even in extreme circumstances, receive the justice and dignity they deserve as essential workers for the global economy.

7.2. In-depth analysis – Underwater Radiated Noise (URN) – an invisible emergency in the oceans

Underwater noise pollution represents one of the fastest-growing anthropogenic pressures on the marine environment. Often overlooked because it is invisible, this phenomenon consists of noise generated by multiple human activities, including commercial shipping, offshore construction, geophysical surveys, and military operations. The impact of this man-made noise on ocean ecosystems is profound, widespread, and, given the transboundary nature of sound in water, its consequences for marine biodiversity are global.

The oceans are acoustically dominated environments, in which a wide range of organisms—from cetaceans and pinnipeds to fish, crustaceans, and invertebrates—depend on the soundscape for vital functions such as communication, orientation, feeding, and reproduction.

Noise pollution represents a critical obstacle to marine life. One of the most serious effects is interference with communication (masking), which drowns out the complex vocalizations used by cetaceans and other species for navigation, hunting, and social interaction. This noise disturbance also causes significant behavioral changes, observable in alterations to migratory routes, feeding habits, and even the reproductive cycles of marine animals. At a deeper level, exposure to noise generates chronic physiological stress, negatively impacting the overall health of organisms and their ability to grow. In the most extreme cases, when noise levels exceed ecological tolerance thresholds, disorientation and mortality occur, which can manifest as strandings and lead to a general impoverishment of biodiversity in those areas. As highlighted by scientific studies, the ocean soundscape in the Anthropocene has radically changed compared to natural conditions, thus making Coordinated global action to address the urgent problem.

Ship Traffic: A Growing Threat

Commercial shipping is currently the main source of continuous underwater noise. Propellers, engines, hull vibrations, and water displacement generate low-frequency sound waves capable of propagating for hundreds of kilometers. Research indicates that the level of underwater noise emitted by ships doubles approximately every decade. This growth is particularly concerning in sensitive regions like the Arctic, where melting ice has enabled a rapid increase in maritime traffic and, consequently, noise pollution. Projections of global trade expansion suggest this trend will continue unless effective mitigation measures are adopted.

The International Community's Response

Over the past twenty years, the severity of the problem has been recognized by numerous international institutions, which have called for government action:

ONU	The General Assembly encourages States to address the socioeconomic and ecological impacts of noise, making explicit reference to IMO guidelines.
Convention on Biological Diversity (CBD)	COP 2022 reaffirmed the need to avoid, reduce, and mitigate significant impacts of noise on coastal and marine ecosystems.
IUCN	The International Union for Conservation of Nature has passed multiple resolutions (most recently in 2021) calling for immediate regulatory action.
Convention on Migratory Species (CMS)	In 2017, it formally recognized the need to limit noise through management measures and regulatory tools.
International Whaling Commission (IWC)	Ha adottato una risoluzione nel 2018 che riconosce l'inquinamento acustico come minaccia crescente, sviluppando un piano di lavoro specifico.

Despite this growing institutional recognition, concrete implementation of measures remains insufficient.

Available Solutions: Technology and Governance

Solutions to mitigate underwater noise pollution are already available and involve two fronts: technical-design and operational. At the technological and design levels, strategies include the targeted redesign of vessels to make them intrinsically quieter, through optimization of propellers and engines, reduction of vibrational energy transmitted by the hull, and the adoption of new materials or advanced hydrodynamic configurations. At the same time, operational measures have proven extremely effective. Among these, the reduction of vessel speed (Vessel Speed Reduction Programs), the redesign of shipping routes to avoid the most sensitive marine habitats, and the rigorous control of the schedules of noisy activities based on marine biological cycles. To encourage the adoption of these practices, incentives and certifications have been introduced, including voluntary programs that reward the quietest ships and the integration of noise certification into maritime sustainability programs. In support of these actions, the new UNDP-GEF-IMO GloNoise Partnership aims to increase global technical capacity, improve monitoring, and promote the adoption of effective national policies, focusing particularly on developing countries, thus offering the opportunity for historic change for ocean health.

The Opportunity for Historic Change

The IMO, as the body responsible for international shipping, is at a crucial juncture. To date, it has only adopted non-binding guidelines, but awareness that the sector must become not only carbon-free but also quiet is growing. Following the 2023 decarbonization milestone, the integration of technical

and operational measures into IMO global standards represents a momentous opportunity for ocean acoustic health.

Achieving the global goal of protecting 30% of the ocean by 2030 also provides a strategic framework for including noise reduction in the management of marine protected areas, enabling the restoration of natural soundscapes and providing immediate benefits to vulnerable species.

Underwater noise pollution is a growing threat that requires a rapid and decisive response. Reducing ocean noise means protecting biodiversity, improving ecosystem resilience, and ensuring the prosperity of one of the planet's most important environments.

International Initiatives: The Coalition for a Quiet Ocean

As mentioned, the problem of underwater noise pollution, an invisible yet powerful threat that interferes with the ability of marine life to communicate, navigate, and survive, has finally found global political traction. At the Third UN Ocean Conference held in Nice, Panama and Canada, along with 35 other countries and the European Union, launched the High Ambition Coalition for a Quiet Ocean. This is the first international political alliance explicitly dedicated to ocean noise reduction. The signatory ministers signed a Declaration outlining an ambitious agenda: promoting the design of quieter ships through the IMO, integrating noise reduction measures into the management of marine protected areas, and supporting technical capacity building (including through the IMO's GloNoise Partnership).

The initiative, which involves governments, industries (such as BIMCO), and NGOs (such as OceanCare), not only aims to conserve biodiversity but also emphasizes the opportunity to adopt science-based solutions that simultaneously reduce both noise pollution and carbon emissions, thus aligning maritime and climate sustainability goals..

CHAPTER III

The Italian Permanent Representation in the IOPC FUNDS and in the IMSO

SUMMARY: 1. THE ITALIAN CONTRIBUTION TO THE ACTIVITIES OF THE IOPC FUNDS – 2. THE MAIN MEASURES ADOPTED BY THE IOPC FUNDS IN 2025. – 3. THE ITALIAN PARTICIPATION THE WORK OF THE IMSO

1. The Italian contribution to the IOPC FUNDS activity

Italy's participation in the work of the IOPC FUNDS is coordinated at the national level by the Interministerial Coordination Commission of the International Oil Pollution Compensation Fund (IOPC), established by the Prime Ministerial Decree of 30 August 1999. Specifically, the Commission coordinates the initiatives of the various interested administrations at the national level (State Attorney General's Office, Ministry of Foreign Affairs and International Cooperation, Ministry of Infrastructure and Transport, Ministry of Economy and Finance, Ministry of the Environment, Ministry of Economic Development) in order to determine Italy's positions within the IOPC FUNDS on issues of hydrocarbon pollution and polluting materials from international maritime transport.

2. The main measures adopted by the IOPC FUNDS in 2025

IOPC Funds Extraordinary and Ordinary Sessions (April-May 2025)

From April 29 to May 1, 2025, the following sessions were held at the headquarters of the Organization for International Oil Pollution Compensation (IOPC FUNDS):

- the 29th extraordinary session of the 1992 Fund;
- the 84th session of the Executive Committee of the 1992 Fund;
- the 13th extraordinary session of the Assembly of the Supplementary Fund of the Contracting Parties to the IOPC FUNDS.

The sessions were attended by staff from the Maritime Office of the Italian Embassy in London and, on behalf of the Presidency of the Council, Ambassador Efisio Luigi Marras. The Assembly of the 1992 Fund did not reach the quorum required to initiate the 29th extraordinary session, which was therefore administered by the Administrative Council.

It was confirmed that, from October 2025, meetings will be held in a hybrid format, with active participation also possible remotely. Amendments to the Rules of Procedure were approved to reflect this change, particularly regarding the quorum, the definition of presence, voting methods, and the role of the Chair. Secret ballots will continue to be held in person only, while roll-call voting may be extended to remote participants. The preparation of an official circular on established practices regarding meetings and credentials was requested.

Regarding Communication and Transparency, the Panama Delegation raised issues related to the Secretariat's communication, proposing a new rule requiring prior consultation between the Secretariat and Member States before the dissemination of potentially damaging information. The proposal did not receive formal support; however, the linguistic alignment of the FR and ES versions

of the Rules of Procedure with the EN version on the topic of "right to speak" was approved, and more transparent and trust-based communication was encouraged.

Document IOPC/APR25/4/1 highlighted the increase in illegal activities by the so-called "dark fleet," consisting of vessels involved in the transportation of oil in violation of sanctions. These vessels, often old and uninsured, pose a growing threat to maritime safety and the environment.

Member States were urged to comply with international conventions and monitor insurance reliability. The Secretariat updated its post-accident investigation procedures in response to this phenomenon.

Regarding the status of the HNS 2010 Convention, the Administrative Council recognized the progress made in ratifying the HNS 2010 Protocol, with eight States already party to the Convention and four (Belgium, Germany, the Netherlands, and Sweden) ready to jointly ratify in the summer of 2025.

Italy announced initiatives aimed at ratifying the Convention.

During the debate, the urgency of implementing the Convention emerged in relation to the growing maritime transport of dangerous goods. Strengthened technical assistance for developing countries was called for.

India proposed asking the IMO to convene a conference to review the 1992 Fund Convention, citing changes in the maritime sector and the need for greater equity. The majority of member states acknowledged the challenges but rejected the proposal, fearing destabilization of the existing system. Despite the formal rejection, the Council left open the possibility for India and other states to submit more detailed proposals in the future.

The Director presented a report on ongoing activities:

- Legal cases: closure of the Prestige case, negative decision on the Redfferm (Nigeria), and progress on other incidents (Princess Empress, Gulfstream, etc.). Italy expressed its full support for the Director's recommendation to appeal the ruling of the Bordeaux Tribunal (February 2025), which declared the Fund's 1992 action against the American Bureau of Shipping (ABS) time-barred. It shared concerns about the misapplication of the 1992 Civil Liability Convention to a non-contractual action against third parties, believing that the correct limitation period was that provided by French law. Italy emphasized the importance of the appeal to protect the Fund's right to compensation and called on all Member States to support the proposal. This position was shared by several States.
- Contributions: 96% of 2024 contributions received; 16 non-compliant States subject to measures under Resolutions 12 and 13.
- Other topics: training, publications, events, and development of the Academy for June 2025.

The Secretariat reaffirmed its commitment to ensuring transparency, efficiency, and speed in reimbursements.

IOPC Funds Sessions (November 2025)

From November 4 to 7, 2025, three important sessions were held at the headquarters of the Organization for International Oil Pollution Compensation (IOPC FUNDS): the 30th Session of the 1992 Fund, the 85th Session of the 1992 Fund Executive Committee, and the 22nd Session of the Supplementary Fund Assembly. Italy participated with staff from the Maritime Office of the Embassy in London and the Coordinator of the IOPC Funds Interministerial Commission for the Presidency of the Council of Ministers.

The sessions formalized Iraq's accession as the 122nd Member State to the 1992 Fund Convention, following its accession on August 5, 2024, which became effective on August 5, 2025. This accession was recognized as a significant step forward in Iraq's commitment to international maritime cooperation.

The Director provided a detailed account of activities, highlighting a high compliance rate of 97% in the submission of Oil Reports by contributing entities. However, serious concern was expressed regarding the eight Member States that have not fulfilled this obligation for over five years. On the economic front, the 2026 budget was approved, maintaining a modest increase of 2.4% in line with

the commitment to sustainability. Regarding personnel policies, the possibility of voluntarily extending working life to age 67 was proposed, along with a simultaneous increase in contributions to the Social Security Fund from 15.8% to 19.6%, aimed at strengthening the stability of the pension system.

To address the problem of States defaulting on the submission of Oil Reports, the Director proposed significant amendments to Resolutions 12 and 3. These amendments aim to introduce specific measures, absent from the current resolutions, in the event of direct financial losses, including postponing compensation payments until the situation is regularized and extending sanctions to cases of economic damage. Since most Member States expressed a favorable opinion, the proposals will be forwarded to the Assembly for final approval.

The effects of the dark fleet on the compensation regime provided by the funds.

A key issue was the growing risk arising from the expansion of the so-called "dark fleet." These vessels, often old, poorly maintained, and with opaque ownership, operate outside conventional insurance networks and engage in unsafe practices (such as deactivating tracking systems), jeopardizing the compensation regime. In this context, the Russian Federation has declared that all ships flying its flag are taking measures to comply with the relevant conventions. In parallel, Panama has announced the implementation of the IMO conventions, no longer accepting the registration of oil tankers and bulk carriers older than 15 years. The Director-General has called on states to strengthen controls on insurance certifications and to cooperate to ensure the transportation of oil and gas on safe and insured vessels.

Italian Initiative for Ratification of the HNS

The 2010 HNS Convention (concerning Compensation for Hazardous and Noxious Substances) received considerable attention, both in the plenary session and in a dedicated side meeting. Ratification Progress: With eight States already ratified, the joint accession of Belgium, Germany, the Netherlands, and Sweden is expected shortly. The Convention's entry into force appears very likely by 2027. The Director expressed hope for a high number of ratifications; in particular, Germany reiterated the new government's commitment to proceeding without delay. The Italian delegation was invited to a small side meeting, organized by the Secretariat with countries close to ratification, specifically dedicated to finalizing the HNS reporting system. At this meeting, the Italian delegation thanked the Secretariat and the existing Contracting States for their assistance and for sharing their experiences in the ratification/accession process. This support is helping Italy advance its efforts to become a party to the Convention.

The HNS Project Manager illustrated the completion of the online digital platform for HNS data reporting and the update of the HNS Finder. The proposed budget for 2026, amounting to £548,200, will cover operational costs and technical support. The Secretariat, while not formally bound, is adopting GDPR principles and integrating artificial intelligence to streamline administration. Finally, two recommendations were made, recorded in sideline conversations: the opportunity for states to ratify the Nairobi Convention on Wreck Removal to complete the IOPC insurance system, and the invitation to submit HNS national reports to the Secretariat, even in draft form and with data not yet officially released.

Updates were provided on the major ongoing incidents, including those involving the Terranova, Perla, Princess Empress, MT Harcourt, Redferm, MT Zeinab, MT Kabir, MT Pasha, MT Prestige, the incident in Israel, and those in the Russian Federation (Volgoneft 212 and Volgoneft 239). For the latter, the Russian Federation declared cleanup operations underway, despite the persistent oil spill in adverse weather and sea conditions.

Finally, amendments to the Rules of Procedure of the three Assemblies were approved to ensure linguistic consistency and gender neutrality. The possibility of livestreaming sessions (following the IMO's example) was discussed, and the three-year review of NGOs with observer status was completed (all confirmed until 2028). Regarding the STOPIA and TOPIA 2006 agreements (with 7,814 registered ships), preparations have begun for the 2026 ten-year review. Finally, interpretative guidance has been adopted to distinguish between ships subject to the 1992 CLC and the 2001 Bunker Convention, establishing that the Operations Log completed and

countersigned by the master constitutes initial proof of the absence of cargo residues.

3.Italy's participation in the work of IMSO

The 51st meeting of the Advisory Committee of the International Mobile Satellite Organization (IMSO) took place from June 9 to 12, 2025.

The IMSO Advisory Committee focused on the status of GMDSS (Global Maritime Distress Safety System) services and the evolution of the satellite communications market. The two currently authorized providers, INMARSAT and IRIDIUM, have maintained service availability levels exceeding required standards, despite encountering some operational issues, particularly the downtime of some MSIP (Maritime Safety Information Providers) stations and issues with updating data on international platforms.

Among the topics discussed was the issue of the blocking of INMARSAT terminals installed on Russian-flagged vessels due to international banking restrictions. In this regard, the Committee focused on the upgrade of the GMDSS system, with the Russian Federation reporting problems in the provision of GMDSS services between 2022 and 2025. INMARSAT Global Limited imposed restrictions on Russian vessels, resulting in the disconnection of over 100 vessels from essential GMDSS services.

From a technical perspective, the IMSO Directorate emphasized the growing risks associated with protecting the L-band spectrum, which is crucial for GMDSS services, reiterating the importance of the Organization's active involvement in the work of the international groups ITU (International Telecommunication Union), IHO (International Hydrographic Organization), and RTCM (Radio Technical Commission for Maritime Services). In this context, IMSO's contribution to the evolution of the S-100 format, which can complement but not replace GMDSS functions, was also highlighted. In parallel, the impact of the expansion of the Starlink constellation, which as of April 2025 numbered over 7,100 operational satellites, was analyzed within a global context of more than 11,400 active satellites.

The IMSO drew attention to the new risks arising from increasing competition for the use of radio spectrum, potential interference, and a still uncertain regulatory framework. In this regard, the fundamental role of Member States and the IMSO in international regulatory processes to ensure the integrity and reliability of the GMDSS system in a rapidly changing landscape was reaffirmed.

The Committee initiated a strategic discussion on the future evolution of the GMDSS, considering the emergence of new technologies such as Low Earth Orbit (LEO) constellations, direct-to-device services, and autonomous navigation systems. Among the options considered, the possibility of introducing maritime rescue tracking tools similar to those adopted in the aviation sector was mentioned, while specifying that any potential development would need to be formally proposed by Member States within the IMO. The discussion also highlighted the growing commercial pressure on the L-band, driven in part by access requests submitted by Starlink, with the risk of interference with the GMDSS services provided by INMARSAT and IRIDIUM.

The Committee recognized the need to protect the spectrum from such interference and confirmed the IMSO's commitment to constantly monitoring the situation, including through the involvement of the FCC (United States Federal Communications Commission) and international regulatory bodies.

The LRIT System

Regarding the Long-Range Identification and Tracking (LRIT) system, the Committee acknowledged progress in the interim phase of the 2025 audit, confirming the system's overall good performance, despite some technical issues and delays in reporting. Over 38,000 vessels were identified as a sample, and while there was a decrease in reported outages, the average duration of outages increased.

The integration of new data centers (including Ecuador, Morocco, and Azerbaijan) and the absence of serious anomalies were highlighted. The Committee discussed the possibility of sharing performance data with the Administrations to strengthen controls and oversight, while respecting confidentiality and the role of flag States. The Committee also supported the opportunity to prioritize annual, rather than monthly, data analysis in order to identify more significant trends over time. Considerations were also raised regarding SpaceX's application for the use of frequencies already partially used for GMDSS services. The Committee acknowledged the potential risk of interference and requested the Directorate to continue technical monitoring and discussions with regulatory authorities, including the possibility of involving the ITU. The Committee also approved the new, clearer and more detailed format for LRIT audit reports, which will be made available to Member States, only upon request.

CHAPTER IV

Concluding observations

2025 was a year of intense activity and significant successes for the Italian Permanent Representation to the International Maritime Organization (IMO), the International Oil Pollution Compensation Funds (IOPC FUNDS), and the International Organization for Maritime Satellite Services (IMSO). The Representation's ongoing commitment and qualified technical contributions, in coordination with the Maritime Office and the General Command of the Port Authorities – Coast Guard, consolidated Italy's strategic role in promoting global maritime safety and sustainability policies.

The successes achieved in the technical working groups and plenary sessions strengthened national interests, positioning Italy as a central player in achieving the goals of the international maritime sector.

Institutional Results and Leadership

The most significant achievement of 2025 was the important re-election to the IMO Council in Category A for the 2026-2027 two-year term, achieved with the highest vote. This achievement demonstrates the high level of credibility and political support Italy enjoys internationally.

Maritime and Environmental Safety: Italy's Technical Commitment

The Permanent Representation has ensured active and influential participation, promoting increasingly stringent international standards, essential for the safety of life at sea and the prevention of accidents.

Naval Innovation and Safety (MSC & SDC)

The Maritime Office has played a crucial role in technical negotiations and regulatory guidance:

- **Life-Saving Appliances (LSA):** Italy, in coordination with the EU, has suggested using the European regulatory framework to refine the definitions of "brand" and "type" of LSA equipment. This is essential to prevent safety risks associated with ambiguous interpretations and to ensure the inseparable link between the original manufacturer and the technical specifications.
- **Recovery of Bodies at Sea:** The Italian delegation reached a significant milestone with the approval of the proposed amendment to the draft guidelines for the recovery of bodies at sea, introducing an explicit reference to the Flag State. The Representation conducted intensive advocacy and compromise efforts to achieve consensus approval.
- **Remote Inspections (RIT) and the ESP Code:** The Representation, supported by the European Commission, argued that amendments to the ESP Code on the use of Remote Inspection Techniques (RIT) should be conditional on the approval of priority IMO Guidelines. Italy also offered to showcase its Genoa facility, which is at the forefront of testing the new RIT.

Combating Underwater Noise Pollution (URN)

Italy actively contributed to the SDC 11 work on Underwater Radiated Noise (URN), participating in the acquisition of data and studies for noise reduction.

Combating Dark Fleets (LEG)

The Representation, in coordination with other European states, successfully promoted the creation of a dedicated working group within the Legal Committee (LEG) to conduct a Regulatory Reconnaissance Exercise (RSE) on fraudulent ship registration and the phenomenon of dark fleets. This result received broad international support, recognizing the need for coordinated IMO action.

Decarbonization and New Fuels

Italy actively participated in the negotiations and contributed to the development of innovative measures to accelerate the transition to sustainable maritime transport:

- **Fire Detection Systems (AI/VFDS):** As part of the work on fuels and battery-powered vehicles onboard container and ro-ro ships, the Representation participated in the analysis of the use of Artificial Intelligence-based Video Fire Detection Systems (VFDS), supporting the study of advanced technologies for risk analysis.
- **Liability (LEG):** Thanks to the work carried out, a new output was approved in the LEG agenda to assess the adequacy of IMO liability and compensation systems with respect to alternative fuels, ensuring that the legal framework follows the technical progress of the MSC and MEPC.

Digitalization and Facilitation

Italy's commitment to simplification, efficiency, and cybersecurity was evident:

- **Digital Identity for Key Workers:** Italy supported the approval of the Guidelines on electronic certificates, emphasizing the value of having an internationally recognized digital identity for maritime workers, essential for interoperability with Maritime Single Window systems.
- **Maritime Single Window (MSW):** The Italian delegation confirmed the advanced state of MSW implementation in Italy and the strengthening of data quality measures in collaboration with ISTAT, supporting the principle of reducing human error and digitalizing processes.
- **Software Maintenance:** The Guidelines for the software maintenance of navigation and communication systems were finalized, a crucial step for cybersecurity and operational efficiency.

Seafarers and Training

The Representation has been committed to improving the conditions and protections of seafarers:

- **STCW Review:** The increase in the number of a technical officer at the IMO was approved, supporting the need to strengthen the Secretariat's capacity to complete the review of the STCW Convention.
- **Training of Berthing Personnel:** Italy successfully co-sponsored the proposed revision of the Guidelines on Minimum Training and Education for Berthing Personnel (including periodic refresher courses), submitting the draft Resolution to the FAL Committee.
- **Defense of IMSSEA:** The Italian delegation conducted intensive negotiations on the sidelines of TC 75, following the termination of the MoU between IMO and IMSSEA. Although the IMO decision was irreversible for financial reasons, open dialogue and cooperation with France led to the best

possible compromise, establishing a path for national institutions (such as IMSSEA) to benefit from ITCP funds through new cooperation memoranda of understanding with WMU and IMLI.

IOPC FUNDS

Italy's participation in the IOPC Funds sessions (April-May and November 2025), ensured by the Maritime Office staff and the Coordinator of the Interministerial Commission, ensured full representation of national interests in oil pollution compensation, both in the 1992 Fund and the Supplementary Fund.

Future Outlook

Looking ahead, the Permanent Representation will continue to strengthen its commitment to continuing its work to implement advanced standards and develop best practices. The priorities will remain decarbonization and achieving the IMO 2050 targets, the simplification and digitalization of maritime transport for modern logistics, and the protection and valorization of seafarers, supporting policies aimed at making the sector increasingly inclusive and safe.

Main abbreviations

ABS	= American Bureau of Shipping
AIEA	= Agenzia Internazionale per l'Energia Atomica
 AIS	= Automatic Identification System
ASSARMATORI	= Associazione Armatori
BL	= Black Carbon
BONIFREP	= Bonifacio Report
BUNKER OIL	= International Convention on Liability for Bunker Oil Pollution Damage
CCC	= Sub-Committee on Carriage of Cargoes and Containers
CESA	= Community of European Shipbuilders Association
CGGS	= Coast Guard Global Summit
CIS	= Contribute Incentive Scheme
CISM	= Comitato interministeriale per la sicurezza dei trasporti marittimi e dei porti
CLC	= International Convention on Civil Liability for Oil Pollution Damage
CMS	= Convention on the Conservation of Migratory Species of Wild Animals
CONFITARMA	= Confederazione Italiana Armatori
ECGFF	= European Coast Guard Functions Forum
EEXI	= Energy Efficiency Existing Ship Index
ESP	= Enhanced Survey Programme
FAL	= Facilitation Committee
FRP	= Plastica Rinforzata con Fibre
FUND Convention	= International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage”del 1971
GDPR	= General Data Protection Regulation
GEF	= Global Environment Facility
GHG	= Greenhouse Gases
GISIS	= Global Integrated Shipping Information System
GMDSS	= Global Maritime Distress and Safety System
HNS	= Hazardous and Noxious Substances
HSSC	= Harmonized System of Survey and Certification
HTW	= Sub-Committee on Human Element, Training and Watchkeeping
IACS	= International Association of Classification Societies
IAPH	= International Association of Ports & Harbors
IBLA	= International Boatmen's Linesman's Association

IBTS	= Integrated Bilge Water Treatment System
ICAO	= International Civil Aviation Organization
IGC Code	= International Code of the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk.
IGF Code	= International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels
IMDG Code	= International Maritime Dangerous Goods
IMSBC Code	= International Maritime Solid Bulk Cargoes Code
IHO	= International Hydrographic Organization
III	= Sub-Committee on Implementation of IMO Instruments
ILO	= International Labour Organization
IMO	= International Maritime Organization
IMCO	= Inter-Governmental Maritime Consultative Organization
IMLI	= International Maritime Law Institute
IMSAS	= International Maritime Organization Member State Audit Scheme
IMSSEA	= International Maritime Safety Security Environment Academy
IMSO	= International Mobile Satellite Organization
INMARSAT	= International Maritime Satellite Organization
INTERTANKO	= International Association of Independent Tanker Owners
IPER	= Institut Portuaire d'Enseignement et de Recherche
IPTA	= International Parcel Tankers Association
IOPC Funds	= International Oil Pollution Compensation Funds
IOPP	= International Oil Pollution Prevention Certificate
ISPS Code	= international Ship and Port Facility Security Code
ITCP	= Integrated Technical Cooperation Programme
ITF	= International Transport Workers Federation
ITU	= International Telecommunication Union
IUU	= Illegal Unreported Unregulated Fisheries
IUCN	= International Union for Conservation of Nature
IWC	= International Convention for the Regulation of Whaling
KUPs	= Knowledge, Understanding and Proficiency
LEG	= Legal Committee
LC	= London Convention
LP	= London Protocol
LRIT	= Long-Range Identification and Tracking
LSA	= Life Saving Appliances

MAECI	= Ministero Affari Esteri e Cooperazione Internazionale
MARPOL	= International Convention for the Prevention of Pollution from Ships
MASE	= Ministero dell'Ambiente e della Sicurezza Energetica
MASS	= Maritime Autonomous Surface Ships
MCGFF	= Mediterranean Coast Guard Functions Forum
MEPC	= Maritime Environment Protection Committee
MIT	= Ministero delle Infrastrutture e Trasporti
MoU	= Memorandum of Understanding
MSC	= Maritime Safety Committee
MSW	= Maritime Single Windows
MIT	= Ministero delle Infrastrutture e dei Trasporti
NAV	= Sottocomitato per la sicurezza della navigazione
NCSR	= Sub-Committee on Navigation, Communications and Search and Rescue
NZF	= Net Zero Framework
PPP	= Precise Point Positioning
PPR	= Sub-Committee on Pollution Prevention and Response
PSC	= Port State Control
PSCO	= Port State Control Officers
PSSA	= Particularly Sensitive Sea Areas
RAIM	= Receiver Autonomous Integrity Monitoring
RINA	= Registro Italiano Navale
RMSCC	= Centri Regionali di Coordinamento della Sicurezza Marittima
RSE	= Regulatory Scoping Exercise
RTCM	= Radio Technical Commission for Maritime Services
SAR	= Search and Rescue
SBAS	= Satellite Based Augmentation System
SDC	= Sub-Committee on Ship Design and Construction
SIDS	= Small Island Developing States
SOLAS	= International Convention for the Safety of Life at Sea
SSE	= Shore side electricity
SSE	= Sub-Committee on Ship Systems and Equipment
SRS	= Sistemi di rapporto navale
STOPIA	= Small Tanker Oil Pollution Indemnification Agreement
STP	= Impianti di trattamento delle acque reflue

SUA Convention	= Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation
STCW	= International Convention on Standards of Training, Certification and Watchkeeping for Seafarers
TOPIA	= Tanker Oil Pollution Indemnification Agreement
UIs	= Unified Interpretations
UNDP	= United Nations Development Programme
URN	= Underwater Radiated Noise
WG	= Working Group
WMU	= World Maritime University
WRNS	= Sistema Mondiale di Radionavigazione

