The Bahamas Maritime Authority

Version No. 1

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IMO Procedures for Port State Control 2025

1. Purpose

1.1. This Technical Alert is issued by the Bahamas Maritime Authority (BMA) to raise awareness of recent changes made to the International Maritime Organization (IMO) Procedures for Port State Control, 2025.

2. Introduction

2.1. The IMO regularly updates the Procedures for Port State Control (PSC), with the latest revision having been adopted at the 34th session of the IMO Assembly in late 2025.

2.2. IMO Assembly Resolution A.1206(34) *Procedures for Port State Control, 2025* has been issued accordingly, and supersedes the previous A.1185(33) *Procedures for Port State Control, 2023*.

2.3. The structure of PSC inspections (initial/more detailed inspections) remains unchanged, with most changes being in the appendices, not the core chapters.

2.4. The revised Procedures significantly reduce tolerance for "paper compliance" where operational knowledge or effective implementation is lacking.

3. Major substantive changes affecting shipowners

3.1. Security now explicitly within PSC scope (NEW)

3.1.1. A new Appendix 20 – Security aspects has been introduced. Although compliance with the International Code for the Security of Ships and of Port Facilities (ISPS Code) remains primarily a Flag State responsibility, PSC now has an explicit procedural basis to:

i. record security-related deficiencies; and
ii. take action where security arrangements are ineffective in practice, not merely incomplete on paper.

3.1.2. Security deficiencies that demonstrate ineffective implementation (rather than minor documentation issues) may now support PSC intervention and escalation, including detention where safety is affected.

3.2. ***Long Range Idendification and tracking (LRIT) compliance elevated to detention risk (SIGNIFICANT CHANGE)***

3.2.1. The following are now explicitly detainable deficiencies:

i. Absence of a valid LRIT conformance test report.
ii. Master or responsible officer not familiar with LRIT operational procedures.

3.2.2. Previously, LRIT deficiencies were often treated as administrative matters. Under A.1206(34), LRIT non-compliance is clearly linked to detention.

3.2.3. LRIT compliance must be treated as an operational safety requirement, not merely a certification issue.

3.2.4. The BMA takes the opportunity to remind all stakeholders that general BMA Policy is that **LRIT must always be operational** – please see Marine Notice 49.

3.3. ***Annex VI of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex VI) – expanded detention grounds (MAJOR CHANGE)***

3.3.1. PSC enforcement under MARPOL Annex VI has been strengthened and clarified.

3.3.2. The following are now clearly detainable, where applicable:

i. Decarbonisation documentation
- Absence of required Energy Efficiency Existing Ship Index (EEXI) documentation.
- Absence of a valid Ship Energy Efficiency Management Plan (SEEMP).
- Absence of required Carbon Intensity Indicator (CII) statements or statements of compliance.

ii. Fuel oil and air-emissions compliance
- Sulphur oxides (SOx) non-compliance, including while operating in Emission Control Areas (ECAs).
- Use of non-compliant fuel oil outside permitted exemptions.

iii. Exhaust Gas Cleaning Systems (EGCS)
- Failure of EGCS (scrubbers) to provide approved equivalency.
- Operation of EGCS outside approved parameters.

iv. Incinerators
- Non-compliant incinerators, particularly post-2000 installations not meeting Annex VI requirements.

3.3.3. PSC inspections will increasingly assess environmental compliance in substance, not just certificate carriage.

3.4. ***Competence now explicitly linked to compliance (REINFORCED)***

3.4.1. For all applicable Conventions:

- Compliance is no longer assessed solely on the presence of equipment or documentation.
- Crew unfamiliarity with required systems (e.g. LRIT, pollution prevention equipment) may support detention.

3.4.2. Training and onboard familiarisation are now critical PSC risk-mitigation measures.

4. Summary of key additional or strengthened detainable items

4.1. ***International Convention for the Safety of Life at Sea 1974, as amended (SOLAS) / Systems***

i. No LRIT conformance test report.
ii. Crew unfamiliar with LRIT operation.
iii. Minimum Safe Manning Document not presented (explicitly listed).

4.2. ***Security***

i. Security deficiencies demonstrating ineffective implementation (Appendix 20).

4.3. ***MARPOL Annex VI***

i. Missing or invalid EEXI / SEEMP / CII documentation.
ii. SOx non-compliance (including in ECAs).
iii. EGCS equivalency failures.
iv. Non-compliant incinerators.

4.4. ***Operational competence***

i. Crew unable to demonstrate operation of statutory safety or pollution-prevention systems.

5. Recommended actions for shipowners and operators

5.1. Shipowners are strongly advised to:

i. Verify LRIT conformance documentation is valid and readily available onboard.
ii. Ensure that Masters and relevant officers are operationally familiar with LRIT systems.
iii. Review MARPOL Annex VI compliance, particularly EEXI, SEEMP and CII documentation.
iv. Confirm EGCS and incinerators are operated strictly within approved parameters.
v. Reinforce crew training and familiarisation, especially for environmental and safety systems.
vi. Review onboard security arrangements to ensure effective implementation, not just documentary compliance.

5.2. Shipowners and operators should expect more consistent and more assertive PSC action in these areas and should take proactive measures to mitigate detention risk.

6. Validity

6.1. This Technical Alert is valid until further notice.

7. Queries

7.1. Any queries on this Alert may be addressed to tech@bahamasmaritime.com in relation to PSC, lrit@bahamasmaritime.com in relation to LRIT, or any BMA office.