



International Maritime Pilots' Association

25th Congress, 2022

Quintana Roo, Mexico

International Regulation Of MASS: IMO's Role

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June 15, 2022**

IMO MASS Activities: History

- **2017. Paper submitted to MSC 98 by 9 delegations requesting “Regulatory Scoping Exercise” (RSE) to establish the extent to which the IMO’s current regulatory framework may need to be adjusted or supplemented to address the operation of Maritime Autonomous Surface Ships (MASS). MSC agrees to the RSE.**
 - **Legal Committee (LEG) and Facilitation Committee (FAL) also initiate RSE for documents and matters under their respective remits.**

HISTORY, cont.

- **2019. MSC adopts interim guidelines on MASS trials in international waters.**
 - **Very general and aspirational**
 - **Flag state may authorize a trial if it is satisfied that the trial “address[es] the risk to safety, security and protection of the environment.”**
 - **Considerable discussion of the right of port States and Coastal states to prevent trials in their waters.**
 - **Compromise language: “Where necessary, authorization should also be obtained from the coastal State and/or port State Authority where the trial will be conducted.”**

HISTORY, cont.

- **May, 2021. MSC 103 approves the “Outcome” of the RSE. Invites delegations to submit proposals for the way forward to address MASS.**
 - **Outcome: MSC.1/Circ. 1638 – 103 pages**

HISTORY, cont.

- **October, 2021. Proposals submitted to MSC 104 by several delegations requesting a work item to develop a code for MASS and necessary consequential amendments to various IMO instruments.**
 - **MSC approves the item with a target completion date of 2025.**
 - **Secretariat and chair directed to prepare a draft “roadmap” of activities and deliverables.**

HISTORY, cont.

- **May, 2022. 105th Session of MSC:**
 - **Adopts the roadmap for work item.**
 - **Agrees that first task will be to develop a non-mandatory MASS Code.**
 - **Goal-based performance standards, for MASS cargo ships, target completion 2024**
 - **Will set the stage for subsequent mandatory Code, also goal-based, to enter into effect on 1 January 2028**
 - **Agrees to establish a joint working group with LEG and FAL Committees to coordinate their respective work.**
 - **Establishes an MSC MASS Correspondence Group (CG).**

THE PRESENT: MSC MASS CG

- **Main task is to “commence development of non-mandatory goal-based MASS Code.”**
- **Coordinator is rep from Marshall Islands**
- **Ambitious timeline and large workload**
- **Oral report to MSC 106, November 2022; written report to MSC 107, May 2023**

MSC MASS CG, cont.

- **Subjects to address:**
 - **Status of MASS Code relative to existing IMO instruments: “stand-alone,” “separate,” or “complimentary”?**
 - **Focus on autonomous functions or systems rather than considering autonomy of ship as a whole?**
 - **Amend definition of MASS and degrees of autonomy?**
 - **Meaning of terms master, crew, and responsible person?**
 - **Remote operation station/centre**
 - **Remote operator as seafarer? Subject to STCW?**

OBSERVATIONS, COMMENTS, etc.

- 1. Is the purpose/goal of developing an IMO regulatory system for MASS to facilitate/expedite introduction of commercial international MASS operations or to ensure that they're safe?**
- 2. Important to recognize ultimate intended feature of MASS is ships operating without control by onboard humans.**
 - Should IMO be a supporter of MASS?**
- 3. Apparent growing acceptance of the idea that control by humans external to the ship is, or can be, as safe, secure, and environmentally responsible as control by onboard humans.**