

MARITIME SAFETY COMMITTEE  
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Agenda items 7 and 8

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**REVISION OF THE GUIDELINES ON MARITIME CYBER RISK MANAGEMENT  
(MSC-FAL.1/CIRC.3/REV.2) AND IDENTIFICATION OF NEXT STEPS  
TO ENHANCE MARITIME CYBERSECURITY (ITEM 7)**

**MEASURES TO ENHANCE MARITIME SECURITY (ITEM 8)**

**Report of the Working Group**

**Introduction**

1 As instructed by the Committee, the Working Group on Cybersecurity and Maritime Security (the Group) met from 19 to 24 June 2025, chaired by Mr. Vusi September (South Africa).

2 The Group was attended by delegations from the following Member States:

ANGOLA	ITALY
ANTIGUA AND BARBUDA	JAMAICA
ARGENTINA	JAPAN
AUSTRALIA	KENYA
BAHAMAS	KUWAIT
BARBADOS	LIBERIA
BELGIUM	MALAYSIA
BRAZIL	MARSHALL ISLANDS
CANADA	MEXICO
CHILE	NETHERLANDS (KINGDOM OF THE)
CHINA	NIGERIA
CYPRUS	NORWAY
DENMARK	OMAN
ESTONIA	PANAMA
FINLAND	PERU
FRANCE	PHILIPPINES
GERMANY	POLAND
GHANA	PORTUGAL
GREECE	QATAR
GUATEMALA	REPUBLIC OF KOREA
INDIA	RUSSIAN FEDERATION
INDONESIA	SAUDI ARABIA
IRAN (ISLAMIC REPUBLIC OF)	SIERRA LEONE
IRELAND	

SINGAPORE  
SOUTH AFRICA  
SPAIN  
SWEDEN  
THAILAND

TÜRKİYE  
UNITED ARAB EMIRATES  
UNITED KINGDOM  
UNITED STATES

by observers from the following intergovernmental organizations in consultative status:

EUROPEAN COMMISSION (EC)  
MARITIME ORGANISATION OF WEST AND CENTRAL AFRICA (MOWCA)  
INTERNATIONAL CRIMINAL POLICE ORGANIZATION (INTERPOL)  
REGIONAL COOPERATION AGREEMENT ON COMBATING PIRACY AND ARMED ROBBERY AGAINST SHIPS IN ASIA – INFORMATION-SHARING CENTRE (ReCAAP-ISC)  
INTERNATIONAL ASSOCIATION OF MARINE AIDS TO NAVIGATION (IALA)

and by observers from the following non-governmental organizations in consultative status:

INTERNATIONAL CHAMBER OF SHIPPING (ICS)  
INTERNATIONAL ELECTROTECHNICAL COMMISSION (IEC)  
COMITÉ INTERNATIONAL RADIO-MARITIME (CIRM)  
BIMCO  
INTERNATIONAL ASSOCIATION OF CLASSIFICATION SOCIETIES (IACS)  
OIL COMPANIES INTERNATIONAL MARINE FORUM (OCIMF)  
INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS (IADC)  
INTERNATIONAL ASSOCIATION OF INDEPENDENT TANKER OWNERS (INTERTANKO)  
INTERNATIONAL GROUP OF PROTECTION AND INDEMNITY ASSOCIATIONS (P & I Clubs)  
CRUISE LINES INTERNATIONAL ASSOCIATION (CLIA)  
INTERNATIONAL ASSOCIATION OF DRY CARGO SHIPOWNERS (INTERCARGO)  
THE INSTITUTE OF MARINE ENGINEERING, SCIENCE AND TECHNOLOGY (IMarEST)  
INTERNATIONAL PARCEL TANKERS ASSOCIATION (IPTA)  
INTERNATIONAL TRANSPORT WORKERS' FEDERATION (ITF)  
WORLD SHIPPING COUNCIL (WSC)  
INTERNATIONAL ASSOCIATION OF AIRPORT AND SEAPORT POLICE (INTERPORTPOLICE)

### **Terms of reference**

3 The Group, based on documents MSC 110/7, MSC 110/7/1, MSC 110/7/2 and MSC 110/8/1, taking into account comments and decisions made in plenary, was instructed to:

- .1 develop the approach on the next steps to enhance maritime cybersecurity, i.e. risk-based/goal-based/prescriptive;
- .2 consider if cybersecurity requirements should be made mandatory or voluntary, and consider the IMO instrument that would be the most appropriate mechanism for implementing any new requirements;

- .3 consider whether any interim measures are required, taking into account existing guidance to enhance maritime cybersecurity while associated requirements are under development;
- .4 develop terms of reference for a correspondence group;
- .5 consider and finalize the proposal in annex 1 to document MSC 110/8/1 on promoting the use of international maritime information-sharing centres to enhance maritime security and to assist in the fight against organized crime threats in the sector, based on document MSC 110/8/1, and advise the Committee on the type of instrument to be used (circular or resolution) for adoption by the Committee; and
- .6 submit a written report by Wednesday, 25 June 2025.

**Revision of the *Guidelines on maritime cyber risk management* (MSC-FAL.1/Circ.3/Rev.2) and identification of next steps to enhance maritime cybersecurity**

***Mandatory/voluntary cybersecurity requirements and mechanisms for implementing any new requirements***

4 In considering its terms of reference as instructed by the Committee, the Group decided to first consider whether cybersecurity requirements should be made mandatory or voluntary and the IMO instrument that would be the most appropriate instrument for implementing any new requirements.

5 In this regard, the overwhelming majority of delegations expressed a preference for voluntary requirements, to be followed by an Experience Building Phase (EBP) and, depending upon the outcome of the EBP, further consideration of the need for mandatory requirements could then be undertaken. This would allow for flexibility in implementation, capacity development, and for necessary information on the effectiveness of any requirements to be gathered under the EBP.

6 The Group subsequently had a wide-ranging discussion on the IMO instrument that would be the most appropriate mechanism for implementing any new requirements.

7 The majority of delegations expressed the view that having concluded that any cybersecurity requirements should be voluntary, the next step should be the development of a non-mandatory cybersecurity Code, to be followed by the EBP and further consideration of mandatory requirements to be based on a new chapter to the SOLAS Convention. Work to develop such a Code would require a proposal for a new output and proposal(s) for a new output could be made by interested Member States and international organizations to MSC 111.

8 Furthermore, any non-mandatory cybersecurity Code had to allow for a comprehensive approach that was both achievable, effective and took account of future developments in this fast-moving sector. Most Member States are experiencing cybersecurity incidents, and current instruments such as the ISM and ISPS Code do not allow for this comprehensive approach. The proposed non-mandatory cybersecurity Code should include both ships and port facilities and also take account of relevant guidance in the development of the non-mandatory MASS Code under this Committee, in the FAL Committee with regard to the security of Maritime Single Window (MSW) and the development of a comprehensive strategy on maritime digitalization, and cybersecurity training requirements in the revision of STCW by the HTW Sub-Committee.

9 The Group concluded that a non-mandatory cybersecurity Code should be developed and interested Member States and international organizations invited to submit proposals on a new output in this regard to MSC 111.

#### ***Risk-based/goal-based/prescriptive***

10 The Group had extensive discussions on the approach to new cybersecurity requirements. The support by the Committee for the use of the term "maritime digital-ecosystem cybersecurity standards" was noted, which reflected the inter-dependent and complex nature of the modern maritime domain. The non-mandatory cybersecurity Code would need to be agile, flexible and avoid setting prescriptive requirements for a constantly evolving threat. Given the dynamic nature of cybersecurity, the Code should be based on a process of risk management that could be quickly adjusted as necessary.

11 The Group concluded that cybersecurity requirements should be goal-based and include risk management, as opposed to prescriptive in nature.

#### ***Interim measures and terms of reference for a correspondence group***

12 The Group discussed, as an interim measure, whether a potential amendment to the ISPS Code would be the appropriate instrument for incorporating cybersecurity provisions. One delegation requested that it be noted that the ISPS Code, in its recommendatory part, encourages the undertaking of ship security assessments on cybersecurity, i.e. paragraph 8.3.5 of part B of the ISPS Code states: "The assessment should address radio and telecommunication systems, including computer systems and networks". Another delegation explained that this paragraph had already been made mandatory by many Member States, and moving this provision to the mandatory part of the Code, i.e. part A of the Code, could benefit other Member States as well. The same could be applied to port facility security assessments. However, the Group noted that amending the ISPS Code would require a new output and this was not supported as a way forward.

13 The Group considered further the need for any interim measures which may be required, taking into account existing guidance to enhance maritime cybersecurity, and terms of reference for any correspondence group. The Group noted that, as the development of any non-mandatory cybersecurity Code would be subject to the approval of proposal(s) for a new output by interested Member States and international organizations to a future session of the Committee, this should not be undertaken by a correspondence group at this stage. Furthermore, the Group was of the view that any preliminary work on a non-mandatory cybersecurity Code should be undertaken by an informal group of experts, and any correspondence group formed only if required following approval of a new output to develop the Code at a future session of the Committee. Some delegations also stressed the need to avoid setting up groups unnecessarily to assist with managing the workload of the Committee. The Group therefore concluded that the establishment of a correspondence group at this stage would not be needed.

#### **Measures to enhance maritime security**

14 A draft base text for an MSC resolution was provided by the co-sponsors of document MSC 110/8/1 (Ecuador et al.). The draft formed the basis of extensive, careful and constructive discussions, involving many delegations throughout the Group's deliberations.

15 Some delegations were of the view that a circular was more appropriate than a resolution, since a circular would provide specific guidance on information-sharing for Member States. In this regard, the Group noted that, considering the differences in drafting a resolution

and a circular, particularly the technical nature of a circular, technical matters were not the intention of the document. The majority of delegations supported the development of a draft MSC resolution, which would highlight the importance of information-sharing and the role of national and regional maritime information-sharing centres in enhancing maritime safety and security. The Group therefore agreed to proceed on the basis of a draft MSC resolution.

16 Recalling the discussion in plenary and the intervention made by the Secretary-General, a number of delegations also expressed concern that the draft MSC resolution must not go beyond the mandate of the Organization, since the Organization supports, in principle, national and regional maritime information-sharing centres but these are not regulated by the Organization. These were under the mandate of Member States or various regional frameworks such as the Djibouti Code of Conduct (DCoC) and the Jeddah Amendment (JA) and the Yaoundé Code of Conduct (YCoC). The Group agreed that a key objective of the draft MSC resolution was to promote the importance of information-sharing, and that due consideration should be given in its development to remaining within the mandate of the Organization, and to the removal/amendment of any preambular and operative paragraphs which went beyond this mandate.

17 There was a suggestion to include a reference to article 1(a) of the IMO Convention as it provides machinery of cooperation between governments. The Group agreed with this suggestion.

18 There was also discussion within the Group on the need to include reference, where appropriate, to resolution A.1190(33) on *Enhancing the framework on the fight against organized crime in the maritime sector* in the preamble to the draft MSC resolution, since the Assembly resolution also dealt with the fight against organized crime in the maritime sector, and had invited Member States to share with the Organization the strategies that in their experience have worked to mitigate the impacts of organized crime on international maritime traffic and port facilities. The Group agreed to include such references in the preambular part of the draft MSC resolution. One delegation expressed the view that IMO instruments that underpin national and regional information-sharing frameworks, including MSC.1/Circ.1333 and MSC.1/Circ.1334, set a best practice baseline for new centres to adopt. It was noted by one delegation that these IMO instruments must be updated and maintained in order to remain useful.

19 Finally, the Group noted several operative paragraphs referring to actions already being undertaken by the Organization, the inclusion of which was deemed unnecessary, and agreed to their suggested deletion.

20 Following the discussion, the Group decided to:

Title

- .1 amend the title of the draft MSC resolution to "Encouragement of maritime information sharing through the use of national and regional maritime information-sharing centres to enhance maritime safety and security";

Preamble

- .2 include article 1(a) of the IMO Convention;
- .3 delete the text "in terms of maritime safety and security" from the end of paragraph 2;

- .4 add the text "importance of maritime domain awareness, and the" at the beginning of paragraph 3 and replace the text "address threats from illicit activities at sea, environmental disasters and search and rescue operations" with "assist in the fight against organized crime threats in the maritime sector" at the end of the paragraph;
- .5 delete paragraphs 4, 5 and 6;
- .6 include a new paragraph 4 "RECALLING the mission of the International Maritime Organization (IMO), as a United Nations specialized agency, is to promote safe, secure, environmentally sound, efficient and sustainable shipping through cooperation,";
- .7 include a new paragraph 5 "RECALLING resolution A.1190(33) on *Enhancing the framework on the fight against organized crime in the maritime sector*, inviting Member States to share with the Organization the strategies that in their experience have worked to mitigate the impacts of organized crime on international maritime traffic and port facilities,";
- .8 include a new paragraph 6 "RECOGNIZING the existence and fundamental role of national and regional maritime information-sharing centres, which facilitate coordination and cooperation, risk analysis and informed decision-making in matters of maritime safety and security, which will contribute to the safety, security, prevention and resilience of the sector, noting the important role of the human element in the maritime traffic to the Organization and its Member States,";
- .9 include a new paragraph 7 "CONCERNED ABOUT threats of organized crime are detrimental to Member States and industry by weakening governance, harming the economy and generating violence,";

#### Operative part

- .10 delete paragraph 1;
- .11 in paragraph 2, delete the text "CALLS UPON Member States to" and replace it with "ENCOURAGES", amend "share" to "sharing of", delete "of such centres", amend "illicit activities" to "illicit activities in the maritime sector", delete "in accordance with existing legal frameworks and international agreements" and replace it with "to include the use of national and regional maritime information-sharing centres";
- .12 delete paragraph 3;
- .13 delete the text "aimed at optimizing the operation of the international maritime information-sharing centres" and replace it with "in order to enhance the sharing of information related to maritime safety and security" at the end of paragraph 4; and
- .14 delete paragraphs 5, 6, 7, 8 and 9.

21 Subsequently, the Group prepared the final text of the draft MSC resolution for adoption at this session with minor editorial changes in addition to the above paragraph 20, as set out in the annex.

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**Action requested of the Committee**

22 The Committee is invited to:

- .1 note the Group's discussion on mandatory or voluntary cybersecurity requirements and the mechanism for implementing any new requirements (paragraphs 4 to 8);
- .2 endorse the Group's conclusion that a non-mandatory cybersecurity Code should be developed and that interested Member States and international organizations are invited to submit proposals on a new output in this regard to MSC 111 (paragraph 9);
- .3 note the Group's conclusion that any cybersecurity requirements should be goal-based and include risk management, as opposed to prescriptive in nature (paragraph 11);
- .4 agree that the establishment of a correspondence group at this stage would not be needed (paragraph 13);
- .5 adopt the draft MSC resolution on Encouragement of maritime information-sharing through the use of national and regional maritime information-sharing centres to enhance maritime safety and security, as set out in the annex; and
- .6 authorize the Secretariat to effect any editorial corrections on the draft MSC resolution that may be required.

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**ANNEX****DRAFT MSC RESOLUTION****ENCOURAGEMENT OF MARITIME INFORMATION-SHARING THROUGH THE USE OF  
NATIONAL AND REGIONAL MARITIME INFORMATION-SHARING CENTRES TO  
ENHANCE MARITIME SAFETY AND SECURITY**

THE MARITIME SAFETY COMMITTEE,

RECALLING article 1(a) of the Convention on the International Maritime Organization that the purpose of the Organization is to provide machinery for cooperation among Governments in the field of governmental regulation and practices relating to technical matters of all kinds affecting shipping engaged in international trade; to encourage and facilitate the general adoption of the highest practicable standards in matters concerning the maritime safety, efficiency of navigation and prevention and control of marine pollution from ships; and to deal with administrative and legal matters related to the purposes set out in this article;

RECALLING the mission of the International Maritime Organization (IMO), as a United Nations specialized agency, is to promote safe, secure, environmentally sound, efficient and sustainable shipping through cooperation,

REAFFIRMING the principles enshrined in the International Convention for the Safety of Life at Sea (SOLAS), the International Convention on Maritime Search and Rescue (SAR), and other international instruments establishing cooperation among States,

TAKING INTO ACCOUNT the importance of maritime domain awareness, and the need to improve coordination and information exchange among Member States, international organizations and stakeholders in order to assist in the fight against organized crime threats in the maritime sector.

RECALLING resolution A.1190(33) on *Enhancing the framework on the fight against organized crime in the maritime sector*, inviting Member States to share with the Organization the strategies that, in their experience, have worked to mitigate the impacts of organized crime on international maritime traffic and port facilities,

RECOGNIZING the existence and fundamental role of national and regional maritime information-sharing centres, which facilitate coordination and cooperation, risk analysis and informed decision-making in matters of maritime safety and security, which will contribute to the safety, security, prevention and resilience of the sector, noting the important role of the human element in the maritime traffic to the Organization and its Member States,

CONCERNED ABOUT threats of organized crime are detrimental to Member States and industry by weakening governance, harming the economy and generating violence,

1 ENCOURAGES sharing of relevant information, including data on maritime safety and security, illicit activities in the maritime sector, environmental incidents, and search and rescue situations, to include the use of national and regional maritime information-sharing centres; and

2 REQUESTS the IMO Secretariat to work with Member States and other relevant international organizations to promote training initiatives, exchange of best practices and technical assistance in order to enhance the sharing of information related to maritime safety and security.