

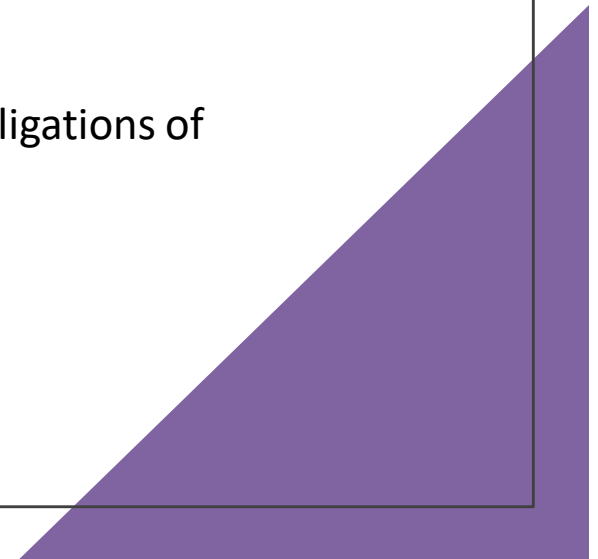
IMO Member State Audit Scheme (IMSAS) of Bangladesh

Audit Findings & Closure

25 August 2025, 1000 hrs

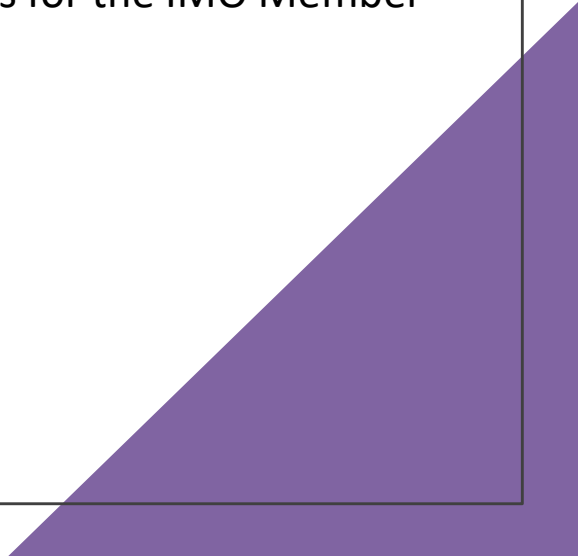
1.0 INTRODUCTION

- The audit of Bangladesh was undertaken from 13 to 22 October 2017.
- Members of the Audit Team was
 - 1.Huseyin Cahit Yalcin (Turkey) Audit Team Leader
 - 2.Regi John (United Kingdom) Audit Team Member
 - 3.Eduardo Ortiz Prats (IMO Secretariat) Audit Officer
- The scope of the audit included the flag, coastal and port state obligations of Bangladesh in relation to the applicable IMO instruments.



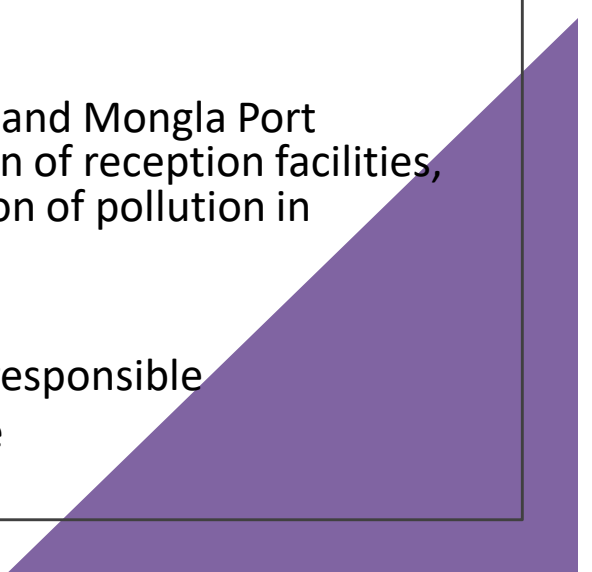
1.0 INTRODUCTION (Cont.)

Purpose of the IMSAS audit

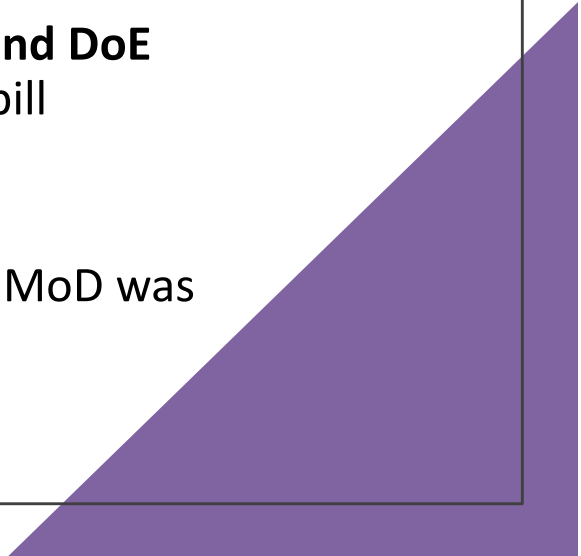
- Assesses compliance with IMO instruments.
 - Adherence to principles outlined in IMO Instruments Implementation (III) Code.
 - Aims to improve maritime administration's performance in maritime safety and marine environment protection.
 - Audit conducted in accordance with Framework and Procedures for the IMO Member State Audit Scheme (resolution A.1067).
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INTRODUCTION (CONT.)

The main entities subjected to the audit are

- **Ministry of Shipping (MoS), Department of Shipping (DoS)** promulgation of all laws, rules, regulations and orders and taking all other necessary steps to give full and complete effect to the mandatory IMO instruments and acts as the regulatory authority
 - **Mercantile Marine Office (MMO)** MMO, affiliated to DoS, was given specific implementation powers for flag and port State obligations
 - **Chittagong Port Authority, Mongla Port Authority.** The Chittagong and Mongla Port Authorities operate under MoS and are responsible for the provision of reception facilities, the handling of dangerous goods, and the monitoring and prevention of pollution in port waters.
 - **Bangladesh Navy (BN),** under the Ministry of Defense (MoD), was responsible for the provision of hydrographic services and the Maritime Rescue Coordination Centre (MRCC)
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INTRODUCTION (CONT.)

- **Bangladesh Coast Guard (BCG), BCG**, under the Ministry of Home Affairs, was co-responsible for conducting Search and Rescue at Sea and identifying pollution in the maritime and coastal jurisdiction of the State, and taking clean up actions
 - **Ministry of Environment, Forest & Climate change (MoEF) and DoE** are responsible for the implementation of the National Oil Spill Contingency Plan (NOSCOP).
 - **Bangladesh Meteorological Department (BMD)** BMD under MoD was responsible for providing meteorological services
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2.0 INSTRUMENTS SUBJECTED TO THE IMSAS AUDIT

- To determine the extent to which Bangladesh met the obligations imposed upon it through its adoption of the following applicable mandatory IMO instruments and the effectiveness of the implementation:
 - International Convention for the Safety of Life at Sea, (SOLAS);
 - International Convention for the Prevention of Pollution from Ships (MARPOL)
 - International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW);
 - International Convention on Load Lines, 1966 (LL 1966);
 - International Convention on Tonnage Measurement of Ships, (TONNAGE 1969);
 - Convention on the International Regulations for Preventing Collisions at Sea, (COLREG 1972);

Audit Findings

- Findings : 18
- Observation: 02

Time frame for completion

- Root cause analysis and Corrective action plan: 90 days (Completed)
- Completion of corrective action : 3 Yrs (Pending)

Schedule for Next Audit

- Mid 2027(tentative)

IMSAS Audit Findings 01

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<ul style="list-style-type: none"> • IMO Mandatory Instruments Transposition into National Legislation Incorporation by reference failed to monitor international amendments. • Referenced IMO instruments did not ensure available texts for the maritime sector and stakeholders. • Insufficient maritime expertise personnel for law promulgation and state responsibilities. 	a. DOS to Establish dedicated IMO Cell with maritime expertise. <ul style="list-style-type: none"> • Assists in legislation promulgation and discharges State responsibilities. • Defines roles for systematic follow-up of IMO instrument amendments. • Monitors entry into force dates for timely incorporation into national legislation. 	Completed IMO Cell established. SoP prepared for different functions, and the focal point	<u>Implementation</u> DOS <u>Coordination</u> MOS	Sept 25
	b. To obtain IMO instruments and publishing amendments on the official website for maritime sector and stakeholders' use.	Outstanding <ul style="list-style-type: none"> • Purchase of digital statutory library. i.e. IMO VEGA • Distribution to user of various entities. 	<u>Implementation</u> DOS <u>Coordination</u> MOS	Sept 25

IMSAS Audit Findings 02

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<ul style="list-style-type: none"> • State compliance with IMO Reporting Requirements insufficient. • Lack of objective evidence of State's compliance with mandatory IMO reporting requirements. • Absence of mechanisms for assigning responsibilities and issuing instructions. 	1. Establish IMO Cell to ensure <ul style="list-style-type: none"> • Mandatory IMO reporting is met • IMO GISIS is updated • Co-ordination with other state entities for reporting. • DOS plans to establish a dedicated unit for IMO issues, tasked with determining information to be communicated under relevant instruments, including laws, orders, ROs, and reception facilities. 	Partial <ul style="list-style-type: none"> • IMO Cell established. • SoP prepared for different communication and updating GISIS functions and the focal point. • Co-ordination with other state entities for reporting 	<u>Implementation</u> DOS, PORT Authorities, Metrology, Hydrography, DOE <u>Coordination</u> DoS, MOS	Sept 25
	2. Involved entities to Develop Quality Management System defines processes for information communication to IMO, Coordination , GISIS updating.	Outstanding <ul style="list-style-type: none"> • Quality management system to be developed with the required information 	<u>Implementation</u> PORT Authorities, BMD, BN, BCG, DOE <u>Coordination</u> DoS, MOS	Sept 25

IMSAS Audit Findings 04

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<ul style="list-style-type: none"> • Lack of National Maritime strategy • Lack of defined responsibilities and methodologies to periodically evaluate performance in respect of meeting obligations under the applicable Conventions 	<ul style="list-style-type: none"> • Form National Maritime Council to include all relevant organizations • Identifies and eliminates causes of non-conformities to prevent recurrence. • Uses monitoring and performance indicators for improvement. • Defines responsibilities for continuous cooperation in non-conformity evaluation, review, and analysis. 	<p>Outstanding</p> <p>National Maritime Council to be reformed and meet to develop strategy and Maritime performance standard.</p>	<p><u>Implementation</u></p> <p>MoS, DoS, Port Authorities, BMD, BN, BCG, DOE</p> <p><u>Coordination</u></p> <p>DoS, MOS</p>	Sept 25

IMSAS Audit Findings 05

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
The Administration did not implement policies for the promulgation of national legislation and guidance which would assist in the implementation and enforcement of the requirements of all safety and pollution prevention conventions and protocols to which the State is a Party.	<ul style="list-style-type: none"> • National legislation and guidance Development for promulgation of IMO instruments • Defined roles and responsibilities for systematic follow-up on national legislation. • Reviewing and reorganizing existing legislation and guidance. 	Partial <ul style="list-style-type: none"> • Included in draft MSA 2025 • MSA 2025 to be enacted. 	<u>Implementation</u> MoS, DoS <u>Coordination</u> DoS, MOS	Sept 25
	<ul style="list-style-type: none"> • Establishing a dedicated unit for IMO issues with maritime expertise. • Establishing roles and responsibilities for the implementation and enforcement of mandatory IMO instruments. 	Completed IMO Cell formed. Roles and responsibilities assigned	<u>Implementation</u> MoS, DoS <u>Coordination</u> DoS, MOS	
	<ul style="list-style-type: none"> • Development of a Quality Management System (QMS) with clear policies and procedures. 	Completed Quality Management System (QMS) developed with clear policies and procedures	<u>mplementation</u> MoS, DoS <u>Coordination</u> DoS, MOS	

IMSAS Audit Findings 06

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>Administration's Safety and Environmental Protection Programme</p> <ul style="list-style-type: none"> • Lack of resources and processes for effective implementation. • Inadequate independent audit and inspection program for issuing required certificates and documentation. • There is a lack of provisions to address requirements left to the satisfaction of the Administration in mandatory IMO instruments. 	<ul style="list-style-type: none"> • Identification of resources and procedures by DOS and MOS. • Recruitment of qualified personnel and allocation of resources under revised organogram. 	<p>Partial</p> <p>11nos of Surveyor & Examiner recruited</p> <p>Organogram to be approved.</p>	<p><u>Implementation</u></p> <p>MoS, DoS</p> <p><u>Coordination</u></p> <p>DoS, MOS</p>	Sept 25
	<ul style="list-style-type: none"> • Updating maritime legislation, including reorganization of existing legislation • Development and implementation of relevant legislation, instruction, and guidance in mandatory IMO instruments. 	<p>Partial</p> <p>MSA 2025 draft completed. To be enacted.</p>	<p><u>Implementation</u></p> <p>MoS, DoS,</p> <p><u>Coordination</u></p> <p>DoS, MOS</p>	Sept 25
	<ul style="list-style-type: none"> • Implementation of documented procedures within QMS for effective monitoring of entities issuing certificates and documents to state-flagged ships. 	<p>Completed</p> <p>Quality Management System (QMS) developed with clear policies and procedures</p>		

IMSAS Audit Findings 07

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<ul style="list-style-type: none"> • Lack of detailed national criteria for recognition and authorization of classification societies. • Lack of evidence to confirm the provision of appropriate national legislation and interpretations to ROs. • Absence of an oversight program with qualified resources for RO monitoring. 	<ul style="list-style-type: none"> • Update and reorganize current legislation to meet RO Code and IMO instruments. 	Partial MSA 2025 draft completed. To be enacted.	<u>Implementation</u> MoS, DoS, <u>Coordination</u> DoS, MOS	Sept 25
	<ul style="list-style-type: none"> • Develop procedures for oversight of ROs, including audits, analysis of detentions, and communication with stakeholders. 	Completed. Elaborate procedure has been developed and oversight audits have been carried out.	On going compliance	
	<ul style="list-style-type: none"> • Implement procedures for information communication to IMO via GISIS. 	Completed GISIS has been updated with RO details.	On going compliance	

IMSAS Audit Findings 08

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>Flag state Enforcement Structure Issues</p> <ul style="list-style-type: none"> • Insufficient enforcement of international rules by ships and entities under the State's jurisdiction. • Insufficient deterrent of fines and inconsistent application of authorities. • Insufficient number of qualified flag State personnel. • Lack of control and monitoring program for statistical data collection, casualty investigation, and response to deficiencies. 	<ul style="list-style-type: none"> • Initiating updates and reorganization of current legislation to include penal clauses to discourage violation of international maritime standards. 	<p>Partial</p> <p>MSA 2025 draft completed. To be enacted.</p>	<p>Implementation MoS, DoS</p> <p>Coordination DoS, MOS</p>	<p>Sept 25</p>
	<ul style="list-style-type: none"> • Recruitment and training of flag State surveyors to enforce national requirements from mandatory IMO instruments. 	<p>Partial</p> <p>11nos of Surveyor & Examiner recruited.</p> <p>Organogram to be approved.</p> <p>Training for Flag state & Port State surveyors done in May 2025 .</p>	<p>Implementation MoS, DoS</p> <p>Coordination DoS, MOS</p>	<p>Sept 25</p>
	<ul style="list-style-type: none"> • Establishing procedures for flag State surveyors and ROs to oversee corrective measures in cases of detention of ships flying the state flag. 	<p>Completed</p> <p>Procedure for Flag State Surveyor/ ROs developed.</p>	<p>Implementation DoS</p> <p>Coordination DoS, MOS</p>	<p>Sept 25</p>
	<ul style="list-style-type: none"> • Development of documented procedures for collecting BD Flag fleet statistical data for analysis. 	<p>Outstanding</p> <p>A documented procedure for Fleet statistical data for analysis is to be developed.</p>	<p>Implementation: DoS</p> <p>Coordination : DoS, MOS</p>	<p>Sept 25</p>

IMSAS Audit Findings 09

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>Surveyor Responsibilities and Authority</p> <ul style="list-style-type: none"> • Incomplete or poorly structured legal arrangements. • Administration lacks a documented system for qualification and knowledge updates. • Flag State surveyors' tasks not authorized. 	<ul style="list-style-type: none"> • Review of National Legislation for Flag State Surveyors roles and responsibilities • DOS to update current legislation for the legal basis of flag State surveyors' tasks. • Development of administrative arrangements to define surveyor responsibilities, authorities, and interrelations. 	<p>Partial</p> <p>MSA 2025 draft completed. To be enacted.</p>	<p><u>Implementation</u> MoS, DoS</p> <p><u>Coordination</u> DoS, MOS</p>	Sept 25
	<ul style="list-style-type: none"> • DOS to develop documented training programs for flag State surveyors. • Documented system to capture existing qualifications, identified training needs, and training received. • Training programs considering WMU courses and IMO model courses. 	<p>Completed</p> <p>A documented procedure for qualification, training needs, and Training received developed.</p>	<p><u>Implementation</u> DoS</p> <p><u>Coordination</u> DoS, MOS</p>	

IMSAS Audit Findings 10

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>Administration's Inadequate Implementation of Casualty Investigation Code</p> <ul style="list-style-type: none"> • Insufficient regulations for impartial, objective investigations. • Lack of trained, impartial investigators for objective investigations. • No cooperative investigations with other member states. • Final investigation report not available to the public and shipping industry. 	<ul style="list-style-type: none"> • Review of National Legislation for Casualty Investigation Code • DOS to develop new legislation for its full implementation and enforcement. 	<p>Partial</p> <p>MSA 2025 draft completed. To be enacted.</p>	<p><u>Implementation</u> MoS, DoS</p> <p><u>Coordination</u> DoS, MOS</p>	Sept 25
	<ul style="list-style-type: none"> • Creation of a new casualty investigation unit reporting directly to the Director General of Administration. 	<p>Outstanding</p> <p>An investigation unit is to be formed.</p>	<p><u>Implementation</u> MoS, DoS, Port Authorities, BMD, BN, BCG, DOE</p> <p><u>Coordination</u> DoS, MOS</p>	Sept 25
	<ul style="list-style-type: none"> • Development of procedures for cooperation with other States and public release of final investigation reports. 	<p>Outstanding</p> <p>To be developed</p>	<p><u>Implementation</u> MoS, DoS</p> <p><u>Coordination</u> DoS, MOS</p>	Sept 25
	<ul style="list-style-type: none"> • Development of training and awareness programs for investigators, support personnel, and other entities involved in casualty investigations. 	<p>Partial</p> <p>All technical officers from DoS attended the training for Casualty Investigation. Pending for other entities</p>	<p><u>Implementation</u> MoS, DoS, Port Authorities, BMD, BN, BCG, DOE</p> <p><u>Coordination</u> DoS, MOS</p>	Sept 25

IMSAS Audit Findings 11

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<ul style="list-style-type: none"> • Absence of system for periodic evaluation and performance evaluation. • Absence of necessary administrative processes, procedures, and resources. • Absence of adoption of mandatory IMO instruments for flag state function. 	<p>All State entities involved in flag State activities should have QMS Procedures & records which involve but are not limited to;</p> <ul style="list-style-type: none"> • Develop a detailed methodology for performance review and evaluation of administrative processes, procedures, and resources. • Identifies key performance indicators based on output for performance measurement. • Leads implementation of QMS procedure across all entities. • Subject to external QMS audits by a certifying body/ approved body 	<p>Partial</p> <p>QMS certificate and audit by 3rd party have been completed for DoS.</p> <p>Pending for other entities.</p>	<p>Implementation MoS, DoS, Port Authorities, BMD, BN, BCG, DOE</p> <p>Coordination DoS, MOS</p>	<p>Sept 25</p>

IMSAS Audit Findings 12

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Proposed Time Frame
<p>SAR regulations Lack</p> <p>• Implementation details unavailable.</p> <p>• National SAR plan not approved or communicated to IMO.</p>	<p>• DOS to develop national legislation and guidelines on SAR.</p>	<p>Partial</p> <p>MSA 2025 draft completed. To be enacted.</p>	<p><u>Implementation</u> MoS, DoS, <u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>
	<p>• Establish coordination among State entities through MoUs.</p>	<p>Outstanding</p>	<p><u>Implementation</u> MoS, DoS, Port Authorities, BN, BCG <u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>
	<p>• Communicate information on existing SAR facilities to IMO.</p>	<p>Outstanding</p>	<p><u>Implementation</u> MoS, DoS, Port Authorities, BN, BCG <u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>
	<p>• Establish shore-based facilities for distress communication and coordination.</p>	<p>Outstanding</p>	<p><u>Implementation</u> MoS, DoS, PORT Authorities, BN, BCG <u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>

IMSAS Audit Findings 13

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>The state lacks a periodic Performance Evaluation System for Coastal State Obligations</p> <ul style="list-style-type: none"> • Not implemented to ensure compliance with IMO international instruments. • Coastal State's activities are not regularly evaluated. 	<p>Applicable to all State entities involved in coastal State activities should develop QMS Procedures</p> <ul style="list-style-type: none"> • Develop detailed methodologies for periodic performance review and evaluation. • Key performance indicators identified based on output for performance measurement. • Subject to external QMS audits by a certifying body. 	<p>Partial</p> <p>DoS QMS certificate and audit by 3rd party have been completed.</p> <p>Pending for other entities.</p>	<p><u>Implementation</u> MoS, DoS, BMD, BN, BCG, DOE</p> <p><u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>

IMSAS Audit Findings 14

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
An effective port State control system with legislation, assignment of responsibilities, policies, guidance, and procedures was not established for the consistent implementation and verification of PSC provisions in the international instruments to which the State is a Party.	<ul style="list-style-type: none"> DOS to develop legislation for effective port State control (PSC) system. 	Partial Included in Draft MSA 2025	<u>Implementati</u> on MoS, DoS, Port Authorities, <u>Coordination</u> DoS, MOS	Sept 25
	<ul style="list-style-type: none"> DOS and MMO to create policies, guidance, and procedures aligned with IMO resolutions and IOMoU provisions. Defined roles and responsibilities for consistent IMO enforcement. 	Completed The procedure has been developed under QMS system	<u>Implementati</u> on MoS, DoS, Port Authorities <u>Co-ordination</u> DoS, MOS	Sept 25

IMSAS Audit Findings 15

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>The State is Party to all MARPOL annexes; its ports were found not to be equipped with the appropriate reception facilities or equivalent arrangements for the reception of Annexes II, IV, and VI.</p> <p>The regulatory structure was not fully established, and the requirements for communication of the relevant information to IMO were not fulfilled.</p>	<ul style="list-style-type: none"> • DOS & PA to develop legislation for adequate reception facilities in Bangladesh's ports. • Proclamation of regulations to ensure compliance with MARPOL's Annexes II, IV, and VI. 	Partial Included in MSA 2025	Implementation MoS, DoS, PORT Authorities Coordination DoS, MOS	Sept 25
	<ul style="list-style-type: none"> • Establishment of waste reception arrangements with private suppliers. • Monitoring of compliance with national legislation and MARPOL. • Issue of annual compliance certificates for suppliers. 	Outstanding Ensure Monitoring & Compliance by port authorities.	Implementation MoS, DoS, PORT Authorities, Coordination DoS, MOS	Sept 25
	<ul style="list-style-type: none"> • Establishment of a quality management system (QMS) for information communication to IMO regarding port reception facilities. 	Outstanding Port authorities to establish Quality Management system	Implementation: MoS, DoS, PORT Authorities, Coordination: DoS, MOS	Sept 25

IMSAS Audit Findings 16

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
The maritime administration has not implemented the IMDG Code, the IMSBC Code and related amendments.	<ul style="list-style-type: none"> • Review of Maritime Legislation And DOS to develop and implement national legislation to adopt IMDG and IMSBC codes. 	Partial Included in MSA 2025	<u>Implementation</u> MoS, DoS, PORT Authorities, BN <u>Coordination</u> DoS, MOS	Sept 25
The dangerous goods handling practices in ports were found not adequately regulated, controlled, or supervised by the competent authorities.	<ul style="list-style-type: none"> • Establishment of an inter-institutional committee to deal with dangerous goods and communicate information to IMO. • Competent authority to develop and supervise IMDG Code implementation, including emergency response and medical first aid procedures. 	Partial IMDG SOP has been developed and approved. PA to develop plans for IMDG handling and Emergency procedures	<u>Implementation</u> MoS, DoS, PORT Authorities, BN <u>Coordination</u> DoS, MOS	Sept 25
	<ul style="list-style-type: none"> • Training programs for shore-based personnel handling dangerous goods & IMSBC. 	Partial Included in IMDG procedure, on going .	Implementation: MoS, DoS, PORT Authorities, BN Coordination : DoS, MOS	Sept 25

IMSAS Audit Findings 17

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
The principle of “No Favourable Treatment” was not officially considered by the authorities.	<ul style="list-style-type: none"> • Reviewing Maritime Legislation Project DOS to develop and implement national legislation for an effective PSC system. • Provision for 'no favourable treatment' provision. 	Partial Included in MSA 2025	<u>Implementation</u> DoS, MMO <u>Coordination</u> DoS, MOS	Sept 25
The port State control programme of the State was not fully consistent with the relevant resolution adopted by the IMO. A proper qualifications and training programme for the PSCOs was not in place.	<ul style="list-style-type: none"> • Coordination between DOS and MMO for PSC activities. • Training programme for existing PSCOs and newly recruited officers. • Training based on WMU courses, IMO model courses, and IOMoU provisions. 	Completed QMS procedure has been developed for the training of PSC inspectors.	<u>Implementation</u> DoS, MMO <u>Coordination</u> DoS, MOS	Sept 25

IMSAS Audit Findings 18

Summary of findings	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
The State had not implemented a system of periodic performance evaluation of its activities as port State for the purpose of verifying compliance with its obligations under the IMO international instruments to which it is a Party.	<p>This applies to all State entities involved in port State activities and DOS's QMS for Port State Activities</p> <ul style="list-style-type: none"> • Develops detailed procedures for performance review and evaluation. • Identifies key performance indicators based on output for performance measurement. • Review these indicators annually during review meetings. • DOS leads QMS implementation and is subject to external audits by a certifying body. 	<p>Partial</p> <p>QMS system establishment. Completed for DoS and MMO.</p> <p>Pending for Port authorities.</p> <p>National Maritime Council to be formed.</p>	<p>Implementation MoS, MoE, DoS, Port Authorities, BN, BCG, DoE,</p> <p>Coordination DoS, MOS</p>	Sept 25

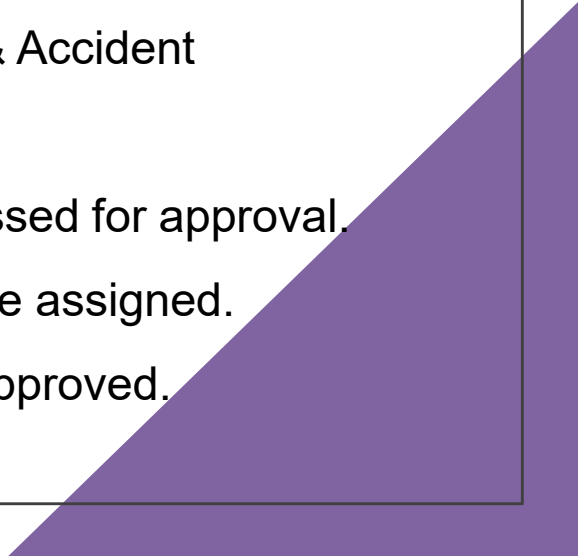
IMSAS Audit Observations 01

Summary of Observation	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Time Frame
<p>State Policy & Strategy development</p> <ul style="list-style-type: none"> • Policy document lacks comprehensiveness for meeting obligations under mandatory IMO instruments. • Lacks monitoring and assessment methodology for effective implementation and enforcement. • Lacks continuous review mechanism for organizational performance improvement. • Insufficient mechanism for flag, port, and coastal State capability. 	<p>MoS, DOS and all State entities Strategy for IMO Instruments</p> <ul style="list-style-type: none"> • Adjust existing strategy to meet State's flag, port, and coastal responsibilities. • Develop Quality Management System (QMS) and monitoring system based on key performance indicators. • Implement the same methodology for all State entities. • Annual review strategy by Maritime Council, covering all relevant measures for mandatory IMO instruments. 	<p>Outstanding:</p> <p>IMO convention implementation strategy to be formulated should include;</p> <p>KPI, QMS and resources are subjected to annual review.</p>	<p><u>Implementation</u> MoS, MoE, DoS, Port Authorities, BMD, BN, BCG, DOE</p> <p><u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>

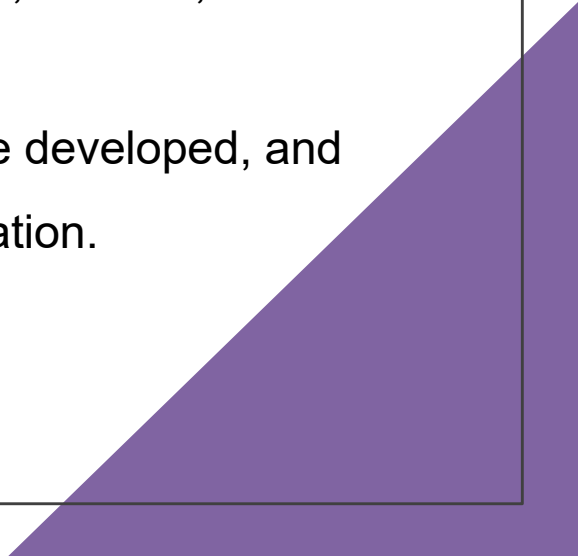
IMSAS Audit Observations 02

Summary of the Observation	Accepted Corrective Action	Status of progress for Corrective Action	Responsible Organization	Proposed Time Frame
<p>Administration's Marine Casualty Investigations</p> <ul style="list-style-type: none"> • Uncertainty in investigator qualifications and knowledge. • Undefined scope of investigations. 	<ul style="list-style-type: none"> • Reviewing Maritime Legislation, DOS to develop legislation for qualified, trained personnel in maritime casualty investigations. • Establishment of documented procedures to define the investigation scope. • Development of investigator training programs, including in-house and abroad training. • Implementation of annual performance evaluation criteria for investigators. 	<p>Partial</p> <p>CI provision kept in MSA 25.</p> <p>Completed for Training but refresher training to be completed.</p>	<p><u>Implementation</u></p> <p>MoS, MOEF, DoS, DoE, Port Authorities, BMD, BN, BCG</p> <p><u>Coordination</u> DoS, MOS</p>	<p>Sept 25</p>

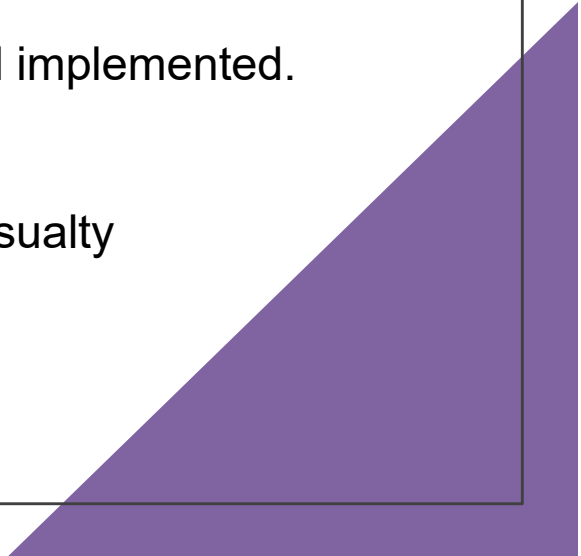
4.0 SUMMARY MAJOR ACTION PLAN COMPLETED OR NEARING COMPLETION

- Merchant Shipping Act 2025 drafted and under review by MoS.
 - DoS has obtained a quality management system and ISO 9001:2015 certification.
 - Eleven Nos Surveyor & Examiner recruited in 2019 to reduce the shortage of maritime professionals. Training has been provided PMTI & Accident investigation
 - New organograms have been drafted and are being processed for approval.
 - IMO Cell has been formed. Roles, responsibility & ToR to be assigned.
 - IMDG & IMBC rules and competent authority procedures approved.
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5.0 SUMMARY MAJOR ACTION PLAN OUTSTANDING

- MSA 2025 to be enacted.
 - National Maritime Council to be formed for performance monitoring
 - National Maritime Strategy to be developed.
 - IMO cell to be made fully functional to oversee Flag State, Coastal, and Port State functions and necessary resources.
 - MOUs to be signed, Quality management procedure to be developed, and KPIs to be set for the entities involved in IMO Implementation.
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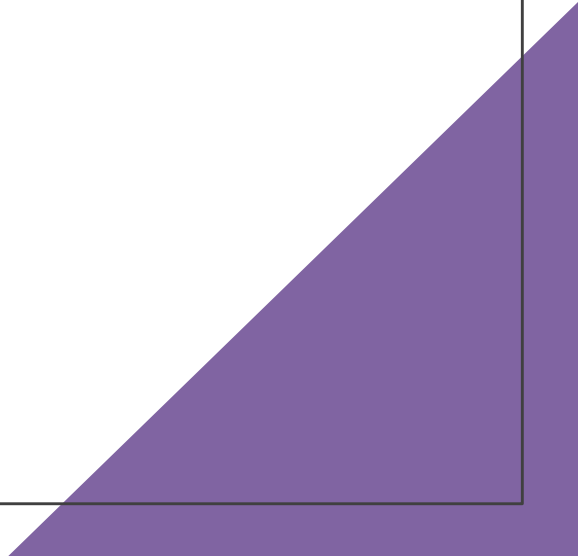
5.0 SUMMARY MAJOR ACTION PLAN OUTSTANDING (Cont,)

- Developing Port reception facilities and oil pollution prevention equipment.
 - Training and development for personnel involved in Flag and port state survey and accident investigation.
 - SAR Plan to be approved, Co-ordination and Drill records.
 - Port IMDG Cargo handling procedure to be approved and implemented.
 - NOSCAP Drill to be conducted.
 - Casualty Investigation Cell to formed in line with IMO Casualty Investigation code and arrangement to be made to exhibit investigation reports in Public.
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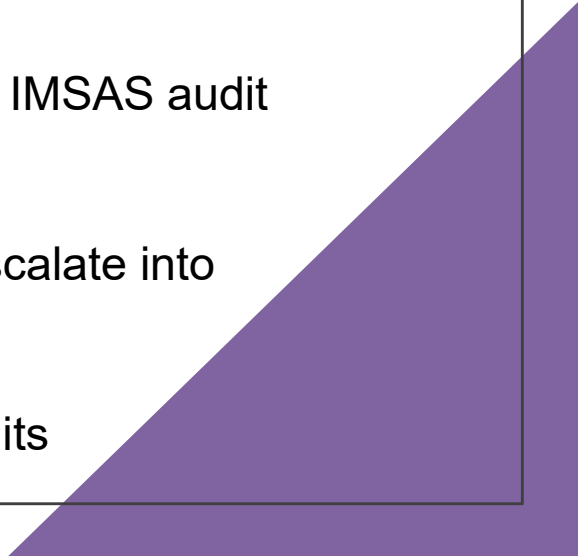
5.0 SUMMARY MAJOR ACTION PLAN OUTSTANDING FROM OTHER ENTITIES

- To participate in the National Maritime Council for performance monitoring when formed
 - Designated a Focal point to be assigned and an IMO cell to be formed for the other entities.
 - MOUs to be signed by other state entities with DoS
 - Quality management system, procedure, and KPIs to be developed with the scope of IMO Convention Implementation and promulgation for other entities.
 - Other entities should deliver information to DoS to update IMO GISIS.
 - Training and development for personnel involved in IMO activities and quality management systems for other entities.
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5.0 SUMMARY MAJOR ACTION PLAN OUTSTANDING FROM OTHER ENTITIES (Cont.)

- SAR Plan to be approved, Co-ordination and Drill records to be maintained.
 - Port IMDG Cargo handling procedure & plans to be approved.
 - Shore reception facilities for Ports to be developed for all Marpol Annexes.
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6.0 IMPLICATION FOR NOT CLOSING AUDIT FINDINGS

- If audit findings highlight non-compliance with regulations, failure to close these findings means the member state may continue to operate in violation of this requirement
 - Open and unresolved audit findings may harm our reputation as a member state and IMO council member.
 - Unresolved audit findings can raise concerns among the IMSAS audit committee and the IMO.
 - If audit findings are not addressed promptly, they may escalate into more significant problems.
 - Unresolved findings can affect the outcome of future audits
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7.0 UPDATES FROM LAST IMSAS MEETING MINIUTES

- Date of last IMSAS meeting: 05/01/2025
- Updates
 - Mongla Port to send the cargo handling procedure-Received on 21/08/2025
 - Draft of Re-Formation of National Maritime Council to be sent to MoS- Forwarded on 09/01/2025
 - Draft of MSA 2025 to be forwarded to MoS –Forwarded

IMSAS AUDIT RESOURCE MATERIALS

bit.ly/4m9stkN



THANK YOU