IMO Member State Audit Scheme (IMSAS) of Bangladesh –March 2028

Audit Preparation

01 September 2026,1030 hrs

INTRODUCTION

- The 2nd cycle audit of Bangladesh expected to be taken place in March 2028.
- The scope of the audit included the Common areas, Flag, Coastal and Port state obligations of Bangladesh in relation to the applicable IMO instruments.

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.
- Support Member state Capacity Building
- Disseminate lessons to other member state

AUDIT AREAS

COMMON AREAS

- Strategy
- Initial actions
- Communication of information to IMO
- Records
- Improvement

FLAG STATES

(Ship registration, Survey, RO, Flag state surveyor, Flag State investigation)

- Implementation
- Delegation of authority
- Enforcement
- Flag State surveyors
- Flag State investigations
- Evaluation and review

COASTAL STATES

(SAR, Pollution Prevention, Hydrography services, Meteorological services etc)

- Implementation
- Enforcement
- Evaluation and review

PORT STATES

(PSC, Port reception facility, IMSBC and IMDG)

- Implementation
- Enforcement
- Evaluation and review

IMSAS AUDIT Framework

- Audit conducted in accordance with IMO III code and Framework and Procedures for the IMO Member State Audit Scheme -resolution A.1211(34).

INTERNATIONAL MARITIME ORGANIZATION

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ASSEMBLY
34th session
Agenda item 9

A 34/Res.1211
5 December 2025
Original: ENGLISH

Resolution A.1211(34)

adopted on 3 December 2025
(Agenda item 9)

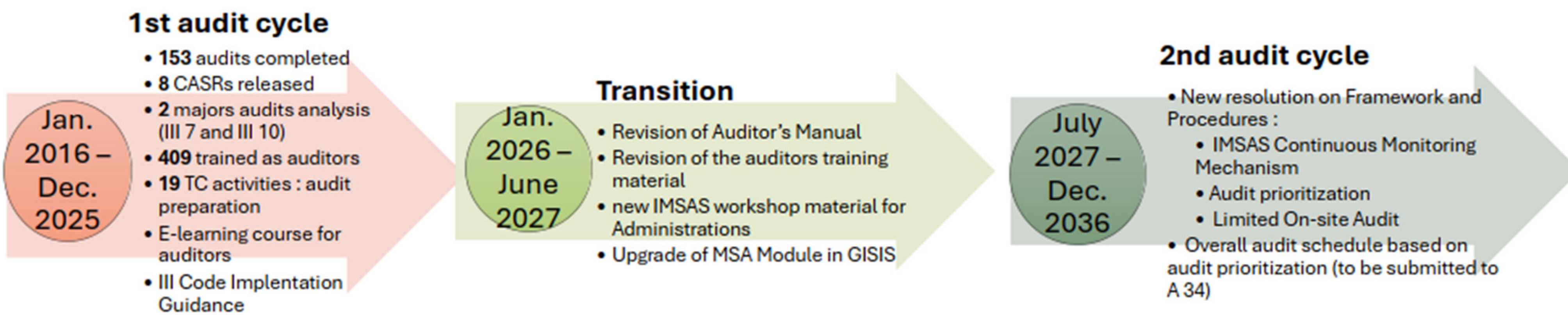
FRAMEWORK AND PROCEDURES FOR THE IMO MEMBER STATE AUDIT SCHEME

IMO 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);

IMO MEMBER STATE AUDIT SCHEME



IMSAS Continuous Monitoring Mechanism (ICMM) Approach

- **ICMM = web-based continuous monitoring mechanism** for IMSAS.
- Member States periodically provide and update information on:
  - **State Audit Questionnaire (SAQ)**
  - **Verification Index** (Previous Audit Findings)
  - **Gap Analysis**
- IMO verifies the information for **completeness, accuracy and reliability**.
- The verified information is used to:
  - prioritize Member State audits;
  - determine areas requiring audit attention;
  - determine eligibility for **Limited On-site Audit (LOA)**.

*"IMSAS is moving from a purely periodic audit approach towards **continuous monitoring and risk-informed audit planning**."*

Component	Basic Question	What it measures
Verification Index (VI)	**Have we fixed our previous IMSAS problems?**	Completed corrective actions from previous audit
Gap Analysis	**Have we addressed applicable IMO obligations?**	Compliance against applicable NEL obligations
State Audit Questionnaire (SAQ)	**Do our systems and arrangements meet III Code requirements?**	Administrative structure, processes and implementation arrangements

From ICMM Data → Audit Type
Verification Index + Gap Analysis + SAQ
⬇️
Average Score
≥ 70%
➡️ **LOA — Limited On-site Audit**
< 70%
➡️ **FOA — Full On-site Audit**

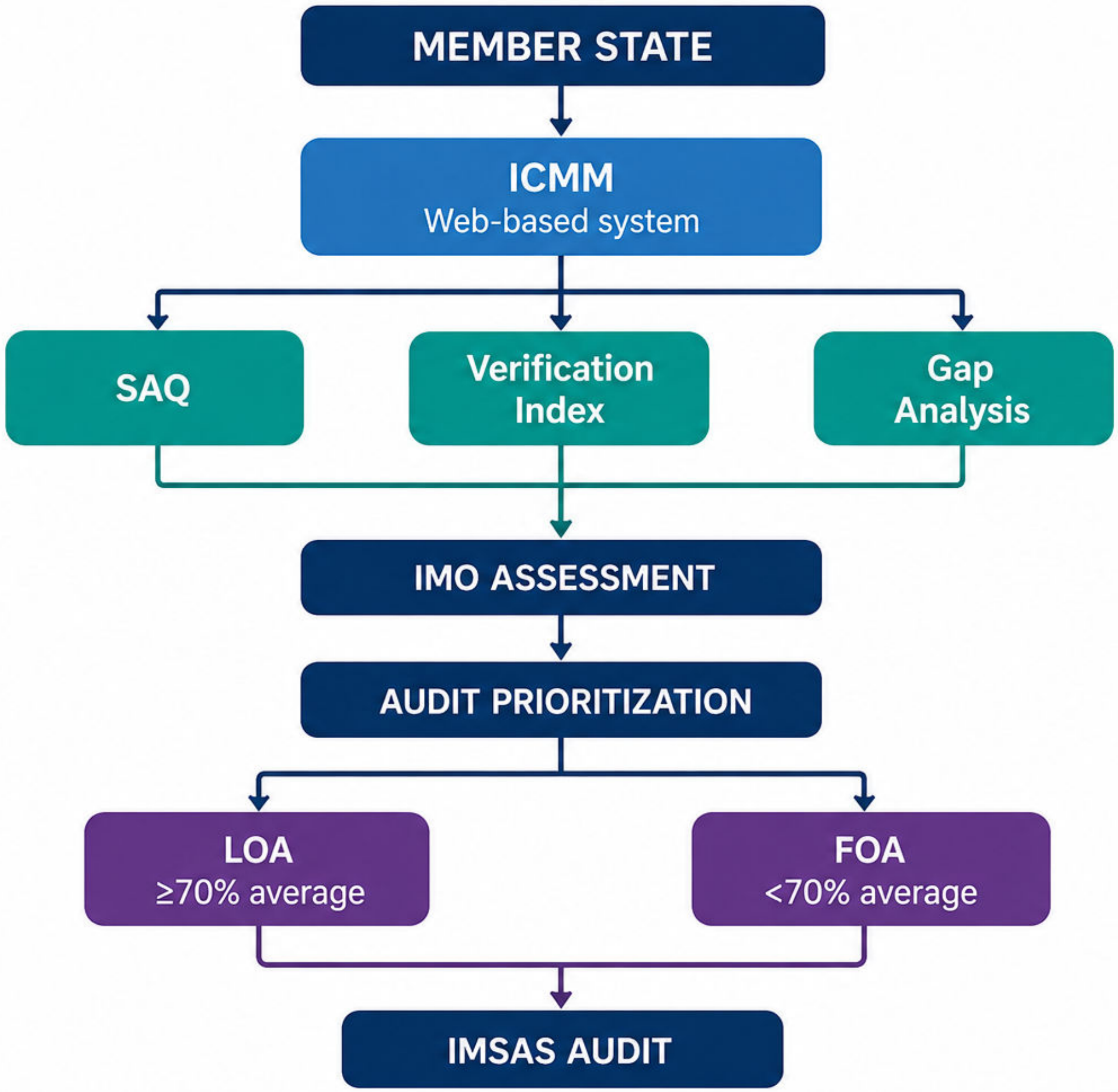
The three indicators are averaged to determine eligibility for LOA. A Member State with an average of **70% or more qualifies for LOA**; otherwise, it undergoes **FOA**.

LOA

- Audit scope can be **focused/limited**.
- Areas may potentially be excluded where:
  - no outstanding finding/observation exists;
  - Gap Analysis indicates compliance; and
  - verified SAQ information indicates compliance.

FOA

- **Full On-site Audit**
- Applies where the Member State does **not qualify for LOA**.


MEMBER STATE
ICMM
Web-based system
SAQ
Verification Index
Gap Analysis
IMO ASSESSMENT
AUDIT PRIORITIZATION
LOA
≥70% average
FOA
<70% average
IMSAS AUDIT

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

- **Port Authorities** for the provision of reception facilities, the handling of dangerous goods, and the monitoring and prevention of pollution in port waters.

- **Bangladesh Navy (BN),** for the provision of hydrographic services and the Maritime Rescue Coordination Centre (MRCC)

- **Bangladesh Coast Guard (BCG), BCG**, 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), pollution in the maritime and coastal jurisdiction of the State, and taking clean up actions

- **Bangladesh Meteorological Department (BMD)** for providing meteorological services

STATUS OF CLOSURE OF FINDINGS

Audit Findings	All Corrective action completed	Partially Completed	Outstanding
• Findings :18 • Observation: 02	• Nil	• 19 (Nineteen)	• 1 (One)

MAJOR ACTION ITEMS FOR CLOSURE OF THE FINDINGS

- Merchant Shipping Act 2026 to be enacted .
- DoS recruitment rules and organogram to be approved.
- Pending MoUs with Bangladesh Navy, Meteorology Department, Department of Environment
- All entities require a quality assurance system **for IMO convention implementation related matters**;
  - KPIs
  - Responsibilities, Training
  - SoPs (Reporting to IMO, Co-ordination with DoS)
  - Record keeping & Communication of imo matters
  - Procedure of dealing with non conformity
  - Performance monitoring

MAJOR ACTION ITEMS FOR CLOSURE OF FINDINGS (Cont.)

- IMO Convention Implementation Strategy to be developed.
- Port Authorities;
  - Approved IMDG handling Procedure and Contingency plan
  - Port Reception Facility
- SAR Plan to be approved, Co-ordination and Drills to be conducted.
- NOSCOP Drill to be conducted.
- Casualty Investigation Cell to be formed in line with IMO Casualty Investigation code and arrangement to be made to exhibit investigation reports in Public.

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 these IMO requirement
- Open and unresolved audit findings may impact on the reputation as a member state.
- Unresolved audit findings can raise concerns among the IMSAS audit committee and the other member state impacting our shipping activities.
- If audit findings are not addressed promptly, they may escalate into more significant problems.
- Unresolved findings can affect the outcome of future audits

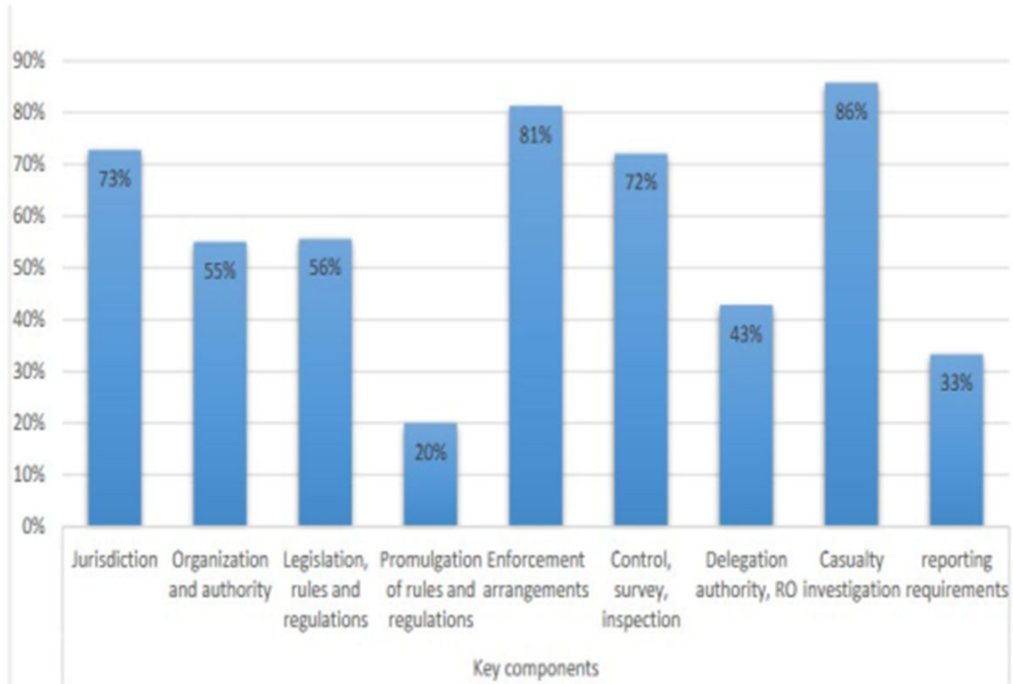
MS Performance – Disclosure of information

Periodical status reports to the Council on the implementation of CAPs by individual MS (once a year)

Member State (1)	Audited (2)	CAP (3)	CPICAP (4)	Findings and/or Observations signed off (5)
Member State A				
Member State B				
Member State C				

Associated Member 1				
Associated Member 2				

Status of effective implentation of III Code (%EI) per individual MS



INTERNATIONAL MARITIME ORGANIZATION

14 July 2026

His Excellency
Mr. Shaikh Rabiul Alam, MP
Minister
Ministry of Shipping
Bangladesh Secretariat
Dhaka-1000
Bangladesh

Dear Minister,

Subject: IMO Member State Audit Scheme (IMSAS) – audit of the People's Republic of Bangladesh, March 2028

I am pleased to inform you that the second audit cycle under the IMO Member State Audit Scheme (IMSAS) has been established following the adoption of resolution A.1211(34) on the revised Framework and Procedures for the IMO Member State Audit Scheme (hereafter Framework and Procedures). Resolution A.1070(28) on the IMO Instruments Implementation Code (III Code), as well as amendments to the following instruments:

1 the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1974);

2 the Protocol of 1988 relating to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS PROT 1988);

3 the International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, as amended (MARPOL 73/78);

4 the Protocol of 1997 to amend the International Convention for the Prevention of Pollution from Ships, as modified by the Protocol of 1978 relating thereto (MARPOL PROT 1997);

5 the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW 1978);

6 the International Convention on Load Lines, 1966 (LL 66);

7 the Protocol of 1988 relating to the International Convention on Load Lines, 1966 (LL PROT 1988);

8 the International Convention on Tonnage Measurement of Ships, 1969 (TONNAGE 1969); and

9 the Convention on the International Regulations for Preventing Collisions at Sea, 1972, as amended (COLREG 1972),

continue forming the regulatory basis for auditing Member States that are Parties to these instruments, using the III Code as the audit standard, to ascertain the level of implementation and enforcement of the provisions of those instruments.

The Assembly, at its thirty-fourth session (24 November to 3 December 2025), endorsed the overall audit schedule for the second audit cycle that was developed based on the principles established in paragraph 4.2 of the revised Procedures for Member State Audit contained in

IMMEDIATE ACTIONS NECESSARY

Priority	Immediate Action	Responsibility
1	Confirm/nominate Bangladesh's SPC for IMSAS 2028 and formally communicate the name, designation, telephone, email and address to IMO	Ministry of Shipping / DoS
2	Confirm audit language to IMO at the earliest opportunity	Ministry of Shipping / DoS
3	Establish a National IMSAS 2028 Preparation Committee/Task Force & Regular update meeting	Ministry of Shipping
4	Establish Ministry of Shipping and Department of Shipping as the central coordination point for all IMSAS preparation activities	MoS, DoS
5	2017 IMSAS audit pending findings and observations are to be closed immediately	MoS , DoS and relevant agencies
6	Identify all agencies/organizations will be audited under IMSAS and nominate focal point	MoS , DoS and relevant agencies
7	Develop specific audit Preparation action plan	DoS / MoS/ Relevant agencies

IMSAS AUDIT RELATED REFERANCE MATERIALS

https://dosdms.smartsoft-bd.com/smart/104

THANK YOU