

INTERNATIONAL REGULATIONS (IR) COMMISSION – CHAIR’S REPORT TO THE WORLD SAILING BOARD, NOVEMBER 2024

The International Regulations Commission provides advice on matters related to the regulation of recreational boats or craft by government actions or otherwise.

Members of the IR Commission monitor regulatory and technical developments in international fora – principally in the various committees and working groups of the International Maritime Organisation (IMO), the International Standards Organisation (ISO) and the European Boating Association (EBA). We make interventions and seek wider support from States and other organisations on behalf of World Sailing’s interests, wherever the potential emerges for additional risks or constraints that might affect the activities and/or safety of racing, cruising, sailing and other recreational craft.

Over the past year members of the Commission have participated in the following meetings:

International Maritime Organisation (IMO)

- Maritime Safety Committee (MSC) 108 (May 2024)
- Marine Environmental Protection Committee (MEPC) 81 (March 2024) and 82 (September-October 2024)
- Sub-committee on Navigation, Communications and Search & Rescue (NCSR) 11 (June 2024)
- Sub-committee on the Carriage of Cargoes and Containers (CCC) 10 (September 2024)
- CCC Correspondence Group on lost containers
- MSC Correspondence Group on Maritime Autonomous Surface Ships (MASS)

International Standards Organisation (ISO)

- Technical Committee 188/Sub Committee 1 in regard to Personal Safety Equipment, and TC188/Working Group 9 on craft dimensions.

European Boating Association (EBA)

- Working Groups attended by expert staff of the UK Royal Yachting Association.

Nothing of major significance has emerged since last Conference that would directly affect the construction, equipment or operation of yachts and other sport and leisure craft. However, we have been monitoring some emerging regulatory, technical and safety issues and trends with particular care:

Maritime security and piracy, where 2023 saw a 15% increase in incidents globally compared to 2022, with 150 incidents recorded in total. This bucked the trend of decreasing incident rates that were reported in previous years. The areas most affected by acts of piracy and armed robbery against ships in 2023 were the Straits of Malacca and Singapore (85 incidents), West Africa (22), South China Sea (14) and South America (Pacific) (14), followed by Indian Ocean (5), South America (Caribbean) (4), Arabian Sea

(2), East Africa (2), South America (Atlantic) (1) and Mediterranean Sea (1). The WS IR Commission's 2022 report on the incidence of piracy and armed robbery remains extant, along with its detailed guidance for yachtsmen on: minimising the risk of capture; how to liaise with and report to regional naval and security authorities; and how to react to actual piracy/armed robbery events. Voyage preparation, threat and risk assessment remain essential when planning any sailing passages in areas of heightened threat, as is the observance of current best management practices (BMP) and reporting protocols. We will update our guidance as necessary to reflect any significant changes to the piracy/armed robbery threat profile, together with any changes to reporting procedures.

New and separate safety concerns have arisen recently in the Southern Red Sea and Gulf of Aden, where there have been 50 incidents of Houthi attacks on shipping since November 2023. While these have been aimed at large merchant and naval vessels, the possibility of attacks on, or collateral damage to, recreational vessels cannot be ignored.

The Navigation, Communications and Search and Rescue Sub-committee (NCSR) approved further updates to performance standards and carriage requirements for VHF, HF, MF and satellite communications and navigation systems (including within GMDSS) – mainly for Convention-sized ships (>500 Gross Tons), but with relevance also to offshore and oceanic sailors. These include the introduction of NAVDAT (digital navigational data) to replace NAVTEX; VHF Data Exchange (VDES) as a more capable vehicle for communications and AIS data; and new performance standards for the reception of Maritime Safety Information (MSI). On the other hand, increasing cyber risks to vessels were also highlighted, and associated guidance issued by the IMO. In addition, the NCSR Sub-committee undertook to continue its work on possible measures to prevent the manipulation of AIS transmissions and tampering with AIS transponders.

NCSR 11 agreed a number of draft amendments to the 3-volume IAMSAR Manual, which provides guidelines for a common aeronautical and maritime approach to organizing and providing search and rescue services worldwide. These will be forwarded for approval at MSC 109, along with a number of proposed vessel routing measures in European and Brazilian waters.

On environmental matters, the IMO has intensified its close focus on greenhouse gas reduction targets, including via the introduction of new fuels and other carbon reduction and carbon capture technologies. While these measures apply principally to ships of SOLAS Convention size (ie over 500 gross tons), we are staying alert to any potential future implications for much smaller vessels too. Similar circumstances apply to developments in the ballast water management and ship recycling conventions.

MEPC 81 approved the establishment of new Emission Control Areas in Canadian Arctic Waters and the Norwegian Sea from 1 March 2027, and endorsed a draft action plan for underwater radiated noise reduction from commercial ships.

We are observing carefully a number of other environmental issues regarding marine plastic litter, waste and black water disposal, alternative fuels, restrictions on some types of anti-fouling, measures to avoid collisions with large ocean mammals, and the

end-of-life disposal of FRP boats. The IR Commission will remain engaged in these topics, both independently and through the EBA, with the main aim of averting the making of regulations that might unnecessarily or disproportionately impact on smaller recreational vessels.

Another area of interest has been the evolving requirements of the IMO's Polar Code, which mandates some specific requirements for routing, environmental protection measures and search & rescue preparedness in polar waters. These requirements have now been formally extended to smaller vessels, including fishing vessels over 24 metres in length, and pleasure yachts above 300 tons. Some States and NGOs are pressing for even further extensions that could implicate all vessels of all sizes navigating in such waters. World Sailing's well-regarded Polar Yacht Guide, which takes the spirit of these provisions and recommends their application to sailing craft in a proportionate and responsible way, is due for review and updating. A member of the IR Commission keeps track of developments in this area.

We remain alert to the new risks to our sailing community presented by the proliferation of autonomous, unmanned or lean-manned surface vessels, with as yet unproven methodologies and technologies for situational awareness and collision avoidance – especially when operating in the vicinity of small, less conspicuous vessels in increasingly congested waters. The Commission has participated in the IMO MASS (Marine Autonomous Surface Ships) Working Group to represent WS' and other small craft interests in this area. Meanwhile the EBA is taking a firm position on the need for adherence to existing COLREGS in determining the rights and responsibilities between vessels, and in resisting the 'risk' of vessels operating autonomously being transferred to recreational boat users and with that, any requirement for recreational craft to be equipped to facilitate detection by autonomous ships. A non-mandatory code for MASS operations is planned for issuance in 2025, followed by adoption of a mandatory code in 2030 for entry into force on 1 January 2032.

Cargo containers lost overboard from ships and floating on or near the surface present a particular hazard to sailing craft. Many hundreds/low thousands of containers are lost at sea every year. In the 15 years between 2008-22, an annual average of 1,566 containers were reported lost overboard. We, along with other national authorities and NGOs, are keen to see measures introduced globally for the reporting, location, tracking and (where practicable) recovery of lost containers. The mandatory reporting of lost containers will enter into force on 1 January 2026: a modest but important step forward. The CCC sub-committee addressed the containers issue this year and will undertake further, more comprehensive work in 2025 to introduce additional preventative measures, including the introduction of lashing software, and measures to improve Masters' awareness of risks to container ship stability.

We continue to have concerns over the potentially heightened risk to recreational craft posed by ever more numerous and larger offshore energy installations, which pose increased challenges to navigational safety. Both the International Regulations Commission and the EBA are monitoring the progress of a current research programme into the cumulative impact of offshore renewables.

Finally, on ISO Standards relating to small craft, the IR Commission this year contributed to the deliberations of specialist Sub-committees and Working Groups addressing the following Standards (see also the separate IR Commission's ISO report for Conference):

- ISO 12217: Stability and buoyancy assessment and categorization. The ISO Technical Committee 188/Working Group 9 has been undertaking a revision of all three parts of ISO 12217, which specifies requirements and procedures for small craft stability, buoyancy assessment and categorization.
- Revision of ISO 12215-9: Sailing craft appendages. The main issue here has been to re-examine and verify the validity of the keel fatigue requirement for series production yachts, and in particular to request that the number design stress cycles be increased by a factor of 2.
- Proposal for a specific standard for sailing helmets. In order to address the increasing risk of severe head injury in high-speed sailing and foiling, the WS representative was successful in proposing a new standard, based on EN 1385:2012 (Helmets for canoeing and white-water sports), with additional criteria and testing procedures for sailing applications. It is anticipated that this will be taken forward by the BSI Standards Development team.
- Revision of ISO 12402-6, to specify personal impact protection for high-speed water-sports, including foiling.
- Revision of ISO 12401: Deck safety harness and safety line requirements and test methods, to reflect learnings from recent incidents involving failures of tethers and tether hooks under high and abnormal loading.

World Sailing will continue to engage with these ISO/BSI developments.

Sir Alan Massey
Chair, International Regulations Commission