

SOLAS CONVENTION AMENDMENTS

Amendments to the International Convention for the Safety of Life at Sea (SOLAS Convention) – mandatory reporting for containers lost at sea

In May, the Maritime Safety Committee (MSC 108) of the International Maritime Organisation (IMO) adopted new amendments to the SOLAS Convention, which require the mandatory reporting of containers lost at sea. The new amendments are expected to be effective from 1 January 2026.

The latest survey conducted by the World Shipping Council revealed that only 221 containers out of the 250 million transported were lost at sea in 2023, a record-low since the survey began in 2008. Containers lost overboard can impose great risks to navigation and safety at sea, as well as to the marine environment. Loss is typically influenced by severe weather conditions, poor load distribution of goods within containers and also within the stowage of containers on deck. The industry has been working together to identify the causes of, and minimise, losses.

Chapter V (Safety of Navigation) of the SOLAS Convention already includes a general obligation for masters to proceed to the assistance of those in distress. The amendments now introduce a process for masters to report containers lost at sea:

1. Amended Regulation 31 now provides that the master of a ship involved in the loss of containers must immediately and thoroughly report the specified details (outlined in paragraph 2 below) to nearby ships, the nearest coastal state, and the vessel's flag state. Masters of ships that observe drifting containers should also make a report to nearby ships and the nearest coastal state.
2. The specified details required in the report are set out in amended Regulation 32:
 - a. For containers lost at sea, a final count of lost containers must be confirmed after a thorough inspection. Mandatory details including the position of the lost containers, the total number lost and whether they contain any dangerous goods must be provided. Additional descriptive information is required if possible. Masters can also share voluntary details about the cargoes and sea conditions.
 - b. For drifting containers observed, position and total number of containers spotted drifting must be reported. Additional voluntary details similar to those in paragraph 2(a) above can also be provided if available.
3. The report must be followed by updates, if and when they become available.
4. The flag state will then pass the information to the IMO via a new module in the Global Integrated Shipping Information System (GISIS), pursuant to amended Regulation 31.

The container supply chain industry has been resorting to online data platforms for many years such as the Cargo Incident Notification System (CINS), a shipping line initiative launched in 2011. CINS captures and analyses operational information on cargo and container incidents and establishes areas of concern aiming to improve safety in the transport chain.

It is expected that the recent amendments to the SOLAS Convention will bring improvements in maritime safety and mitigate environmental risks via a centralised governmental platform, and are welcomed by the World Shipping Council, the main industry trade association representing the liner shipping industry.

Reactions from other stakeholders remain to be seen, in particular those of carriers and masters, the latter of whom are now subject to new reporting obligations. In the past, through advising clients we have witnessed the difficulties faced by shippers, carriers and others in the container supply chain when complying with SOLAS Convention amendments. For instance, different jurisdictional approaches and timetables were implemented almost a decade ago as a result of previous amendments to the SOLAS Convention which required declaration of the verified gross mass of packed containers, and needed essential guidance from competent authorities. See our earlier discussion [here](#).

From now through to 1 January 2026, it is expected that signatories to the SOLAS Convention and their respective competent authorities will issue guidance to support the industry comply with the new amendments and consider how and when any enforcement actions will be taken in cases of non-compliance.

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