

Is the IMO Fit for Purpose?

(A Lifeboat Industry Perspective)

By Andrew Lemmis | 29 April 2025

Imagine a football match where the referee is paid by the teams and has no power to award a free kick or issue a red card. He can suggest the rules, sure, but it's up to the players whether they want to follow them.

Sound absurd?

That's essentially how the International Maritime Organization (IMO) functions, and nowhere is this more painfully clear than in the regulation of lifeboat systems.

The IMO, the UN agency responsible for setting global maritime safety standards, is funded by the very countries it expects to regulate. It has no independent enforcement powers. Instead, it relies on member states, the same ones who debate, draft and vote on the rules, to enforce them voluntarily.

It's a system built on trust.

And when it comes to lifeboat safety, that trust sometimes feels dangerously thin.

Now, to be fair, the IMO has made significant contributions. The SOLAS amendments. The introduction of MSC.402(96) to professionalise lifeboat servicing. The pending acceptance of ISO 23678 to set global standards for technician training.

These are not minor achievements.

But here's the uncomfortable truth: regulation is one thing. Enforcement is something else entirely.

Take the servicing of lifeboats and davits.

The IMO clearly mandates that only "authorised" service providers should carry out maintenance. Sensible, right? But who decides who's authorised?

The flag state.

And not all flag states are equal in how they handle that responsibility.

Some, like the Marshall Islands, which manages one of the world's largest ship registries, have outsourced their operations to private companies. Commercial efficiency may be high, but what about oversight? What about consistent, independent auditing of service providers?

Others, like Liberia, take a different approach, charging service providers hefty fees for initial approvals, and additional fees every time they attend a vessel for service.

Typically US\$300 per inspection, per vessel.

Multiply that by the 5000+ ships flying the Liberian flag, and the sums are enormous.

But where does that money go?

Is it being reinvested into improving flag-state oversight of lifeboat systems? Into more rigorous audits of service suppliers? Or is it simply becoming another cost of doing business?

But the real divide becomes even clearer when you look beyond these examples.

The reality is: most flag states don't engage deeply with service providers at all.

Apart from a few, like Bahamas, Barbados, Liberia, and Panama, the majority either fully delegate their responsibilities to their Recognized Organizations (ROs), or simply accept any service provider that has approval from another flag or RO. In practice, that means a vessel flagged with Country A might use a service provider approved only by Country B, with little or no direct scrutiny.

And as with flag states, not all classification societies are created equal either.

While the IACS umbrella provides unified requirements, notably UR Z17 for the approval of service suppliers, each class society maintains its own internal standards. And their interpretation and application of those standards can vary, not just between different class societies, but between different regional offices, and even between individual surveyors within the same office.

Even when a flag administration clearly states that it accepts approvals from any RO or other flags, relying on these approvals can be problematic. In the real world, service quality, auditing rigor, and follow-up enforcement often differ based on geography, commercial relationships, and sheer human inconsistency.

When the safety of critical life-saving systems hinges on this level of variability, it raises an uncomfortable question:
How much protection does a regulatory framework really offer if its application depends so heavily on where a vessel happens to be, or who's on duty that day?

And even when progress is made, when new regulations are finally adopted after years of debate, the challenges don't stop there.

In many cases, to secure enough agreement to move forward, regulations are written broadly, leaving important details to be covered later by *Unified Interpretations* or *guidance notes*. On paper, it sounds cooperative. In practice, it often means that the actual application of safety standards depends on how carefully individual parties read between the lines.

The industry is left relying not only on the regulation itself, but on an evolving patchwork of interpretations, guidance documents, and assumed best practices.

And there's an even deeper issue buried in the language.

The debate between "**shall**" and "**should**" may seem like legal hair-splitting, but it has very real consequences.

- "**Shall**" is mandatory — an obligation.
- "**Should**" is guidance — a recommendation.

Yet many IMO instruments blur this line, either by mixing mandatory requirements with non-mandatory guidance in the same text, or by leaving crucial safety actions categorised as "should", leaving it up to the operator's discretion whether or not to comply.

For something as critical as lifeboat safety, discretion should never be the fallback. Clear, mandatory requirements save lives. Recommendations, while well-intentioned, leave too much room for interpretation, for delay, and, in the worst cases, for tragedy.

When a system relies more on trust, interpretations, and good intentions than on clear, enforceable action, it again raises the uncomfortable but necessary question:
Is it really fit for purpose?

Representation inside the IMO itself is another complicated issue.

You might assume that countries overseeing the largest fleets, and therefore the greatest number of lifeboat systems, would carry the most influence. But influence at the IMO is shaped as much by politics, historical alliances, and budget contributions as it is by fleet size or safety responsibility.

Even more concerning: when IMO committees meet to discuss new regulations, flag states can, and often do, bring external advisors with them.

Sometimes, these advisors represent shipowners' associations, manufacturers, classification societies, or even commercial service providers.

In theory, this expertise should enrich the debate.

But in practice, it opens the door for conflicts of interest.

People who stand to profit (or lose) from regulatory changes are often sitting at the same table as the regulators themselves, helping draft the rules.

Is it any wonder that progress can be slow? Or that regulations are sometimes watered down until they're more palatable to commercial interests?

Transparency has also become a recurring concern.

Despite being a UN body, the IMO operates with relatively little external scrutiny compared to other international organisations.

Meeting agendas and outcomes are often published, but the detailed deliberations behind key decisions? Not always.

Access to working groups and subcommittees is sometimes restricted.

Observers, including NGOs, environmental groups, and even some seafarer associations, have long criticized the lack of transparency, questioning whose interests are really being served behind closed doors.

Meanwhile, on the frontlines, onboard the vessels themselves, not much has changed fast enough.

We've all seen the cycle:

- A major lifeboat accident.
- A flurry of investigations and casualty reports.
- Recommendations issued.
- Amendments discussed.
- Years later, real-world practices remain stubbornly inconsistent.

Inspections vary depending on which flag a ship flies.

Service quality swings depending on which company was cheapest that day.

And crews often have little say in whether the equipment they rely on in an emergency has been properly maintained, or just properly certified on paper.

So, is the IMO fit for purpose, especially when it comes to lifeboat safety?

Honestly, it depends on what you expect its purpose to be.

If the goal is to set a minimum global baseline, a common framework that most countries can at least agree to, then yes, the IMO still serves a vital role.

Without it, we'd likely have regulatory chaos, fragmented standards, and even greater risk.

But if you expect the IMO to drive fast, independent, uniform enforcement of life-saving equipment regulations, to guarantee that every crew member boarding a lifeboat is stepping into something genuinely fit for purpose, then no, it falls short.

Not because the people involved don't care. But because the system itself was never built for that kind of direct, independent oversight.

If we're serious about reforming maritime safety, particularly lifeboat safety, then the difficult questions need to be asked:

- Should flag states face stricter external audits on their approval processes?
- Should safety-related fees, like Liberia's \$300 per inspection, be subject to public accountability and measurable reinvestment into safety programs?
- Should external advisors with commercial interests have limits on their influence during rulemaking?
- Should the language in safety instruments leave no room for ambiguity between "shall" and "should"?
- And shouldn't transparency at IMO meetings become the norm, not the exception?

Until these issues are addressed, the safety of lifeboat systems, and the lives depending on them, will continue to hinge on something worryingly fragile: trust.

And in the maritime world, when it comes to lifeboats, trust alone is never enough.

Author's Note

With nearly 40 years in the maritime safety industry, I've witnessed firsthand both the strengths and the shortcomings of our regulatory systems.

This article isn't written to criticise the IMO for the sake of it, it's written to spark an open, honest conversation about how we can do better.

I welcome your perspectives, experiences, and ideas, whether you agree, disagree, or see a different way forward.

Because when it comes to lifeboat safety, and the safety of seafarers worldwide, there's too much at stake to stay silent.