

Implementation of Resolution MSC. 553(108) – Amendments to the 2011 ESP Code on Approval of Thickness Measurement Firms



Preamble

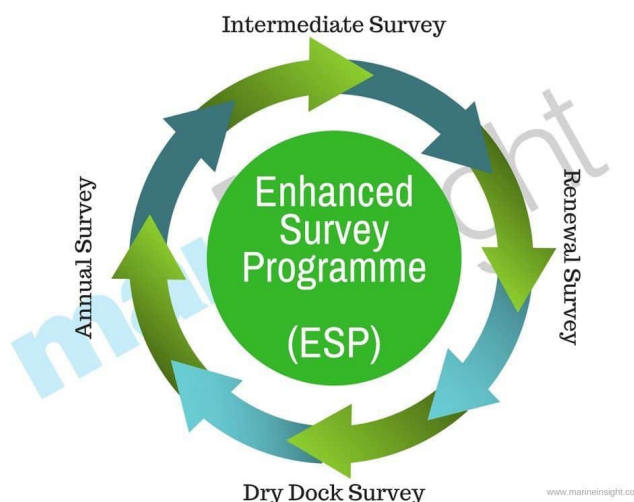
This technical information provides a concise overview of the amendments to the 2011 ESP Code adopted by resolution MSC.553 (108), which **enter into force on 1 January 2026** and introduce enhanced requirements for the approval of firms engaged in thickness measurement of hull structures. While the scope of the ESP survey requirements remains unchanged, the amendments clarify that documentation for approval is to be submitted to the Administration and establish a mandatory administrative audit to verify the organization, management, and technical capability of the thickness measurement firm. This document supports ship-owners, ship managers and attending surveyors in understanding the new requirements and in ensuring that only duly approved and audited firms are engaged for thickness measurements during ESP surveys.

1. Purpose and Scope

1.1 Purpose

The purpose of this technical information is to provide practical instructions to ship-owners, ship managers and attending surveyors on how to implement the amendments to the International Code on the Enhanced Programme of Inspections during Surveys of Bulk Carriers and Oil Tankers, 2011 (2011 ESP Code), as adopted by resolution MSC.553(108).

These amendments concern the procedures for the approval and certification of firms engaged in thickness measurement (TM) of hull structures, and introduce a mandatory audit by the Administration as part of the approval process.



1.2 Scope of Application

This guidance applies to:

- Bulk carriers and oil tankers to which the 2011 ESP Code is mandatory under SOLAS chapter XI-1; and
- Firms engaged in thickness measurement of hull structures (TM firms) whose services are used in connection with ESP surveys of such ships.

It is intended for use by:

- Ship-owners and ship managers, in planning and managing surveys and dry-docking;
- Designated persons and ISM managers, in maintaining and updating the SMS and survey/planned maintenance procedures;
- Surveyors of classification societies/recognized organizations (ROs), in verifying compliance during ESP surveys; and
- TM firms, in preparing for approval and audit by the Administration.

1.3 Effective Date

The amendments adopted by resolution MSC.553(108) are enter into force and become mandatory on 1 January 2026. From 1 January 2026, all approvals and renewals of TM firms for ESP purposes are to comply with the amended provisions of the 2011 ESP Code.

2. Regulatory Background

2.1 2011 ESP Code

The 2011 ESP Code establishes the enhanced programme of inspections for bulk carriers and oil tankers and is made mandatory under SOLAS chapter XI-1. It sets detailed requirements for the planning, preparation and execution of surveys, including conditions for hull structure examination, measurements and reporting.

Within the Code, specific annexes describe the “Procedures for approval and certification of a firm engaged in thickness measurement of hull structures” for:

- a) Single-side skin bulk carriers;
- b) Double-side skin bulk carriers;
- c) Double-hull oil tankers; and
- d) Oil tankers other than double-hull oil tankers.

2.2 Resolution MSC.553 (108)

Resolution MSC.553 (108), adopted by the Maritime Safety Committee at its 108th session, introduces targeted amendments to these annexes. The purpose of the amendments is to:

- a) Clarify that the documentation for approval of a TM firm is to be submitted to the Administration; and
- b) Strengthen the approval process by requiring that the TM firm be audited by the Administration, following a satisfactory document review, to confirm its organizational capability and technical competence.

2.3 Role of the Administration and Recognized Organizations

Under SOLAS and the 2011 ESP Code:

- a) The Administration is the approving authority for TM firms.
- b) The Administration may delegate certain tasks to recognized organizations (ROs) acting on its behalf, in accordance with the applicable RO Code and bilateral agreements.
- c) Ship-owners and ship managers remain responsible for ensuring that only TM firms approved and audited by, or on behalf of, the Administration are engaged to carry out thickness measurements required by the ESP Code.

3. Summary of Key Amendments Introduced by MSC.553 (108)

3.1 Submission of Documents to the Administration

In the annexes of the 2011 ESP Code dealing with oil tankers, the introductory text of the paragraph describing document submission requirements for TM firms has been revised to state explicitly that the required documents shall be submitted to the Administration for approval.

This clarification removes any ambiguity regarding the approving authority. It confirms that:

- a) The Administration (or an RO acting on its behalf) is responsible for evaluating and approving the documentation submitted by TM firms; and
- b) TM firms must ensure that their documentation packages fully address the requirements of the relevant annex and are submitted through the channel designated by the Administration.

3.2 Mandatory Audit of Thickness Measurement Firms

In all relevant annexes of the 2011 ESP Code (covering bulk carriers and oil tankers), the paragraph dealing with the evaluation of TM firms after document submission has been replaced. The amended text requires that after satisfactory review of the submitted documents, the TM firm shall be audited by the Administration; and the purpose of this audit is to ascertain that the firm is duly organized and managed in accordance with the approved documentation and is capable of conducting thickness measurement of the hull structure of ships.

In practice, this means that:

- a) Approval of a TM firm is no longer based on document review alone;
- b) A formal administrative audit (which may include office audits, review of management systems, verification of personnel qualifications, equipment, calibration records and reporting procedures) is an integral part of the approval and renewal process; and
- c) TM firms must maintain a level of organization, management and technical competence consistent with the documentation submitted to, and approved by, the Administration.

3.3 No Change to the Fundamental Survey Requirements

The amendments introduced by MSC.553 (108) do not modify:

- a) The basic requirements for thickness measurements during ESP surveys;
- b) The extent of measurements, survey planning documents or acceptance criteria for hull structures.

Instead, they reinforce the quality and reliability of thickness measurement services by tightening the approval and oversight of TM firms.

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