

SUB-COMMITTEE ON SHIP DESIGN AND
CONSTRUCTION
12th session
Agenda item 9

SDC 12/9/2
13 November 2025
Original: ENGLISH
Pre-session public release:

**DEVELOPMENT OF A SAFETY REGULATORY FRAMEWORK TO SUPPORT THE
REDUCTION OF GHG EMISSIONS FROM SHIPS USING NEW TECHNOLOGIES AND
ALTERNATIVE FUELS**

**Establishment of a correspondence group on the revision of SOLAS chapter VIII and
the Code of Safety for Nuclear Merchant Ships (Res A.491(XII))**

Submitted by WNTI, ITF and RINA

SUMMARY

Executive summary: This document proposes the establishment of a correspondence group to make timely progress on the revision of SOLAS chapter VIII and the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)). It also contains a proposal for draft terms of reference for a correspondence group, based on the draft work plan in document SDC 12/9.

Strategic direction, if applicable: 3

Output: 3.8

Action to be taken: Paragraph 12

Related documents: MSC 110/6/4, MSC 110/WP.9, MSC 110/21 and SDC 12/9

Introduction

1 MSC 110 agreed to initiate the revision of SOLAS chapter VIII and the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)) (Nuclear Code), and for this work to begin at SDC 12.

2 As highlighted in document MSC 110/6/4 (Republic of Korea et al.), the revision and update of the Nuclear Code and SOLAS chapter VIII should be a high priority in the efforts to reduce GHG emissions from ships. Given the magnitude and complexity of this task, it could take SDC around a decade to complete the revision and update, leaving technology developers and ship builders without clarity until the mid-2030s, unless a significant portion of the work is undertaken intersessionally.

Background

3 Following further work on the continuous output "Development of a Safety Regulatory Framework to Support the Reduction of GHG Emissions from Ships Using New Technologies and Alternative Fuels" (GHG Safety) at MSC 110, the Committee agreed to assign all tasks in annex 5 to document MSC 110/WP.9 to the SDC Sub-Committee and requested that this work start at SDC 12, including the establishment of a correspondence group, if deemed necessary (MSC 110/21, paragraph 6.58).

4 As outlined in documents MSC 110/6 (United States) and MSC 110/6/4, the Nuclear Code, in its current form, represents a barrier to the uptake of new nuclear reactor technologies. Furthermore, MSC 110/6/4 highlighted that maritime stakeholders have already made significant investments in developing a new generation of marine-appropriate reactors which are expected to be available to the market around 2030. An appropriate regulatory framework should be in place to allow ships the use of these new technologies as they become available.

5 The co-sponsors of this document believe that intersessional work will be needed at SDC, including in a correspondence group, in order to update the regulatory framework for nuclear-powered ships by 2030. This is needed to ensure that stakeholders have clear criteria and regulatory standards to design, build, operate and decommission the next generation of nuclear-powered ships.

Establishment of a correspondence group and draft terms of reference

6 Among the tasks given to SDC 12 by MSC 110 was to prepare a work plan for all the work related to the tasks in annex 5 to document MSC 110/WP.9 and to report back to MSC 111.

7 The co-sponsors have submitted a draft work plan specifically for the revision of SOLAS chapter VIII and the Nuclear Code, which can be found in document SDC 12/9. In line with the draft work plan in SDC 12/9, the co-sponsors propose to establish a correspondence group (CG) at SDC 12, and to re-establish the CG at subsequent sessions of SDC for as long as deemed necessary.

8 In line with the draft work plan in document SDC 12/9, the co-sponsors propose that the Sub-Committee instructs a correspondence group, in accordance to the following draft terms of reference (ToR), taking into account the work and relevant documents considered at SDC 12:

- .1 analyse the Nuclear Code against other parts of SOLAS to identify gaps and barriers and conduct an assessment of how this may impact on the Nuclear Code revision;
- .2 consider the structure of the Nuclear Code and assess potential restructuring to facilitate technology-agnostic application and inclusion of goals and functional requirements;
- .3 based on the outcomes of .1 and .2 above, develop recommendations on how to address inconsistencies between the Nuclear Code and other parts of SOLAS, and develop a plan for the structure of the updated Nuclear Code; and
- .4 submit a written report to SDC 13.

9 If SDC 13 agrees to re-establish the CG, the ToR will depend on how work has progressed in the interim, and whether there will be an intersessional working group between SDC 13 and SDC 14. It is therefore premature to propose draft ToR for a CG between SDC 13 and subsequent sessions of SDC but, as an early indication, ToR for future CGs may include the following elements:

- .1 assessment of whether elements of other IMO instruments, in particular the MARPOL Convention, the STCW Convention and Code and the Hong Kong Convention, may impact the Nuclear Code revision;
- .2 development of recommendations for how to address elements identified under .1 above, including potential amendments to other IMO instruments to ensure nuclear ships are adequately covered;
- .3 assessment of IMO vs. International Atomic Energy Agency areas of responsibility and development of recommendations to ensure consistency between their goals and requirements within the updated Nuclear Code;
- .4 assessment of the need for amendments to SOLAS chapter VIII and development of recommendations;
- .5 assessment of the need for further guidelines, in addition to the two currently referenced in the footnotes to SOLAS VIII/2 and VIII/11; and
- .6 assessment of concrete proposals for revisions of the Nuclear Code and development of recommendations.

Proposals

10 For the reasons outlined in paragraph 2, 4 and 5 above, the co-sponsors propose that the Sub-Committee establish a correspondence group on revision of SOLAS chapter VIII and the Code of Safety for Nuclear Merchant Ships (resolution A.491(XII)) at this session (SDC 12).

11 It is proposed that this document, and the draft work plan in the annex to document SDC 12/9, be taken into account when developing terms of reference for an intersessional correspondence group on nuclear ships between SDC 12 and SDC 13.

Action requested of the Sub-Committee

12 The Sub-Committee is invited to consider the information in this document and the proposals in paragraphs 10 and 11 above, and take action as appropriate.