

Public–Private Roundtable on Integrity in Maritime Operations (MACN–India)

Theme :

Strengthening Integrity, Transparency and Trust in India’s Maritime Ecosystem

Date & Venue :

22 December 2025 | DGS, Mumbai

Convened By : Maritime Anti-Corruption Network (MACN)

Supported By : Directorate General of Shipping, Ministry of Ports, Shipping and Waterways, Government of India

Objective

The roundtable aims to bring together senior leadership from Government, ports, enforcement agencies, shipowners, operators, and industry bodies to:

- Address corruption risks across port and ship interfaces
- Strengthen reporting, redressal, and whistleblower confidence
- Protect seafarers from operational, legal, and financial harm
- Align India’s maritime governance with global integrity frameworks

Format

- High-level closed-door public–private roundtable
- Experience sharing by enforcement agencies and industry
- Focused discussion on practical solutions, reporting mechanisms, and institutional collaboration

About the Maritime Anti-Corruption Network (MACN)

The Maritime Anti-Corruption Network (MACN) is a global, industry-led collective action initiative dedicated to tackling corruption in the maritime sector. It brings together shipowners, operators, charterers and maritime stakeholders to address corruption risks through collaboration, data-driven insights and practical solutions.

MACN works closely with governments, international organisations and civil society to identify systemic corruption risks across port and ship interfaces and to promote transparent, rule-based processes. Its approach focuses on capacity building, collective action and fostering a culture of integrity across the maritime ecosystem.

Through incident reporting, research and public–private dialogue, MACN supports safer operations, protects seafarer welfare and strengthens trust and credibility in global maritime trade.

Expected Outcomes

- Shared understanding of corruption risks impacting maritime security and seafarer welfare
- Strong signalling of India's zero-tolerance stance
- Clear pathways for cooperation between DGS, MACN, ports, and industry
- Reinforced trust in reporting and grievance redressal mechanisms

List of Attendees :

Name	Designation	Organisation
Dr. M. Angamuthu, IAS	Chairperson	Mumbai Port Authority
Shri Gaurav Dayal, IAS	Chairperson	Jawaharlal Nehru Port Authority
Capt. Binesh Kumar Tyagi	Chairman & Managing Director	Shipping Corporation of India
Mr. Nitish Kumar Sinha, IRS	Principal Chief Commissioner	Mumbai Customs Zone-1
Shri Vimal Kumar Srivastava, IRS	Principal Chief Commissioner	Mumbai Customs Zone-2
Ms. Niyati Thaker Dave, IPS	Deputy Commissioner	FRRO, Bureau of Immigration
Vice Admiral Krishna Swaminathan	Flag Officer Commanding-in-Chief	Western Naval Command, Indian Navy
Shri Bhisham Sharma	Inspector General (West)	Indian Coast Guard
Dr. Dhaval Thorat	Port Health Officer	Port Health Organisation, Mumbai Port
Shri Manoj Kumar, IRS	Chief Vigilance Officer	DGS, MbPA & JNPA
Capt. Sunil Chand Panigrahy	Director (i/c)	Indian Maritime University, Mumbai Port Campus
Capt. Mihir Chandra	Director	Indian Maritime University, T.S. Chanakya
Dr. Brajesh Mishra	Joint Director	Directorate of Plant Protection, Quarantine & Storage
Capt. Deepak Tewari	Chairman	Container Shipping Lines Association (CSLA)
Capt. Rajesh Tandon	Chief Executive Officer	FOSMA

Shri Deepu Kishinchandani	Managing Committee Member	MASSA
Shri Rajnish Khandelwal	Executive Committee Member	MANSA
Shri Anil Devli	Chief Executive Officer	INSA
Capt. K.N. Deboo	India Representative	GlobalMET
Capt. Dinesh Jairam	General Manager	Seaspan Crew Management India Pvt. Ltd
Shri Mark Ho	Managing Director	Yang Ming Line India Pvt. Ltd
Shri Pracheta Prabhu	Managing Director	Teekay Shipping India Pvt Ltd
Shri Vivek Venugopal	Compliance Head	NYK Shipping Pvt. Ltd
Shri Max Chao	Assistant to the President	U-Ming Line
Capt. Rakesh Singh	President	ICCSA
Capt. M.P. Bhasin	Master	Company of Master Mariners of India
Shri Kaushik Kumar Seal	President	Institute of Marine Engineers India
Shri Sunil Vasvani	Executive Director	CSLA



Public – Private Dialogue on Maritime Anti-Corruption Network (MACN)

Directorate General of Shipping

22nd December 2025 | Mumbai

Public–Private Dialogue on Maritime Anti-Corruption (MACN)
Directorate General of Shipping | 22 December 2025 | Mumbai

Good afternoon.

This Public–Private Dialogue is being convened at a time when integrity in maritime operations has become a critical enabler of safety, efficiency and national credibility. Maritime corruption is not merely a compliance issue; it directly affects ease of doing business, operational predictability, crew welfare and India’s standing as a responsible maritime nation.

The Government of India has repeatedly emphasised a **zero-tolerance approach to corruption**, aligned with broader national objectives of good governance, transparency and institutional accountability. These principles are central to India’s aspirations under *Atmanirbhar Bharat*, *Viksit Bharat* and *Amrit Kaal*, and are particularly relevant in a sector as internationally integrated as shipping.

In this context, the **Maritime Anti-Corruption Network (MACN)** has emerged as a significant global collective action platform, bringing together shipowners, operators

and stakeholders to address corruption risks in a structured and practical manner. MACN is a recognised industry association, acknowledged by the International Maritime Organization, and represents a substantial share of global shipping tonnage.

Over the past three and a half years, MACN-India has been actively engaging with Indian port stakeholders, shipping companies and public authorities to supplement national efforts against maritime corruption. Initiatives such as structured recommendations, outreach programmes and the operationalisation of the MACN Help Desk have demonstrated that coordinated public–private action can deliver tangible outcomes, including faster incident resolution and reduced operational friction.

Today's dialogue is intended to provide an open platform for discussion between government agencies, industry representatives and maritime associations. The objective is to **deepen and institutionalize collaboration**, identify practical measures to strengthen integrity at ports and ship-shore interfaces and align India's maritime governance framework with international best practices, including IMO guidance on preventing and addressing maritime corruption.

This engagement reflects the Directorate General of Shipping's commitment to transparent, rule-based enforcement, protection of seafarers and creation of a fair and predictable maritime operating environment.



Directorate General of Shipping

India's Maritime Regulator



- Established:** 3 September 1949 as an attached office under Ministry of Commerce; now functions under the **Ministry of Ports, Shipping & Waterways (MoPSW)**.
- Mandate:** Formulates and enforces **shipping policies and legislations** in India.
- Global Role:** Serves as India's **Maritime Administration**, representing the country at the **IMO** and other international maritime forums.
- Presence:** Headquarters in **Mumbai**, supported by 14 **Mercantile Marine Departments (MMDs)** PAN India.

Key Wings & Branches :

• Engineering	• Crew
• Nautical	• Shipping Development
• Naval Architecture	• Administration
• Coastal Shipping	• Training

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

22nd December 2025

Core Functions :

- Policy & Regulation :** Formulates shipping policy, enforces national & international legislations.
- Ship Safety :** Surveys, inspections, and certification of vessels.
- Seafarers** Training, competency certification, and welfare.
- Environment & Green Shipping :** Implements MARPOL, promotes decarbonisation & alternate fuels.
- Ship Recycling :** Regulates and monitors yards, ensures HKC compliance.
- International Engagement :** Represents India at IMO & global maritime forums.

Slide 2 of 23

Directorate General of Shipping (India's Maritime Regulator)

Allow me to briefly introduce the **Directorate General of Shipping**, the apex maritime regulatory authority of India.

Established in **1949**, the Directorate has evolved over the decades from a small office under the Ministry of Commerce into a full-fledged maritime administration under the **Ministry of Ports, Shipping and Waterways**. It continues to serve as the central institution responsible for **formulating, implementing, and enforcing national and international shipping policies and legislation** in India.

Our mandate is broad and holistic — covering every dimension of India's maritime domain. We are responsible for **ship safety, seafarer training and welfare, environmental protection, and the promotion of green and sustainable shipping practices**. At the same time, we ensure compliance with conventions of the **International Maritime Organization (IMO)** and other global instruments.

From our **headquarters in Mumbai**, we operate through a network of **14 Mercantile Marine Departments** strategically located across the country — from Kandla and Kochi to Kolkata, Chennai, and Port Blair. These MMDs act as our field arms for inspections, surveys, certification, and maritime governance, ensuring that the standards we uphold in New Delhi and Mumbai are implemented uniformly across all Indian ports and coasts.

The Directorate's work is organized across key functional wings and branches - **Engineering, Nautical, Naval Architecture, Crew, Administration, Coastal Shipping, and Training**. Together, these verticals form the operational backbone of

India's maritime ecosystem.

Our **core functions** reflect both our regulatory mandate and developmental vision:

We **formulate and enforce policy**, keeping pace with global maritime law.

We ensure **ship safety** through surveys, inspections, and certification.

We oversee **seafarers' training, competency, and welfare**, enabling India to remain one of the top seafarer-supplying nations in the world.

We are driving the **green shipping transition**, implementing MARPOL and promoting alternate fuels and decarbonization.

We also regulate **ship recycling**, with India leading globally in Hong Kong Convention-compliant yards.

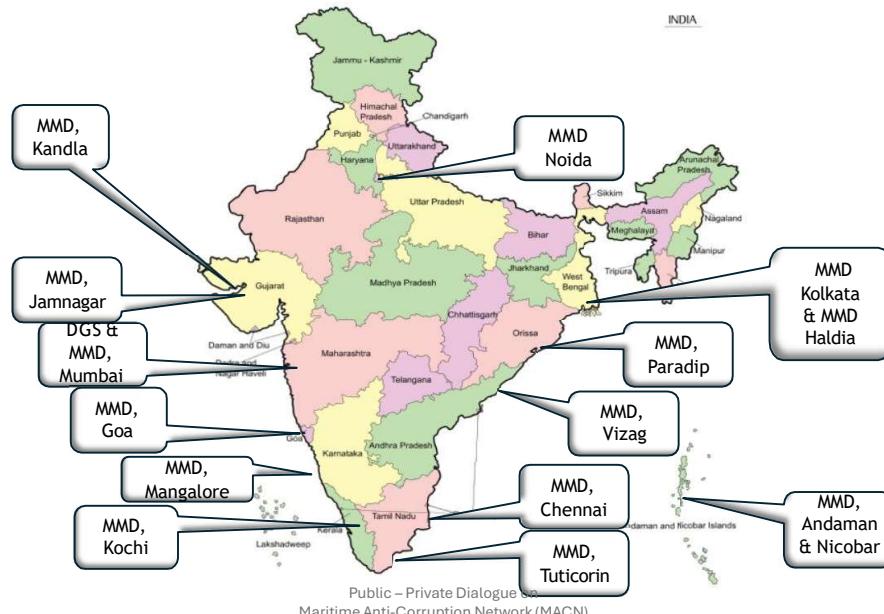
And finally, we play a pivotal role in **international engagement**, representing India at the **IMO** and multiple global maritime forums.

In essence, the Directorate General of Shipping stands at the confluence of **policy, regulation, sustainability, and international cooperation** — ensuring that India's maritime growth remains both safe and sustainable, aligned with the **UN Sustainable Development Goals** and the vision of a **Viksit Bharat by 2047**.

“We are not just regulators; we are enablers of India’s maritime future.”



Mercantile Marine Departments



22nd December 2025

Slide 3 of 23

Mercantile Marine Departments

"This map illustrates the national footprint of the Directorate General of Shipping through its network of Mercantile Marine Departments, or MMDs."

The Directorate operates through **14 Mercantile Marine Departments** strategically located along India's vast coastline and inland regions. These offices act as the **operational arms** of the Directorate, ensuring that all statutory functions related to **safety, certification, inspection, training, and compliance** are executed efficiently and uniformly across the country.

From **Kandla** and **Jamnagar** in the west, to **Kolkata, Haldia, and Paradip** in the east, and from **Tuticorin** and **Kochi** in the south to **Noida** in the north, each MMD serves as a crucial link in India's maritime administration framework. The presence of an MMD in the **Andaman and Nicobar Islands** also ensures regulatory coverage of India's strategic island territories.

Each of these departments is headed by a **Principal Officer**, supported by technical and administrative staff from diverse disciplines—engineering, nautical, and naval architecture—working in close coordination with the Directorate in Mumbai.

Their role is not merely administrative but also regulatory and service-oriented. They conduct **surveys of Indian and foreign ships**, issue **certificates of competency to seafarers**, carry out **port State and flag State inspections**, and ensure the **implementation of international maritime conventions** such as SOLAS, MARPOL, and STCW at the regional level.

Together, this network ensures **nationwide maritime governance**, providing accessibility and uniformity in the enforcement of shipping laws and safety standards, irrespective of where a vessel or seafarer is located in India.

“In short, these MMDs form the backbone of our field operations — ensuring that every port and coastal state in India remains connected to the Directorate’s regulatory framework, and that the standards we uphold internationally are implemented locally with equal rigour.”



Context & National Imperative



Why This Matters

Maritime corruption is not a standalone issue.

It directly affects safety, seafarer welfare and the efficiency of global trade flows.

Ports as Strategic Gateways

- Ports are the **first and last interface** between ships and the State
- Any lack of integrity at ports has **system-wide ripple effects** across shipping and logistics

Integrity as a National Priority

- Integrity in port operations is essential to:
 - **Ease of Doing Business**
 - **Reduction of logistics costs**
 - **India's credibility as a trusted maritime nation**

22nd December 2025

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Maritime Anti-Corruption Network (MACN)

Slide 4 of 23

Context & National Imperative

“Before we discuss solutions, it is important to recognise why this issue matters at a national level.”

Maritime corruption is **not an isolated procedural problem**.

It has **direct and far-reaching consequences** for maritime safety, the welfare and dignity of seafarers, and the overall efficiency of global trade.

Ports occupy a **strategic position** in the maritime ecosystem.

They represent the **first and last point of contact between ships and the State**.

Every interaction at a port — whether related to entry, inspection, documentation or exit — shapes how India is perceived as a maritime nation.

When integrity at ports is compromised, the impact is **systemic**.

It affects not only one vessel or one operator, but **entire supply chains**, logistics costs, and confidence in regulatory predictability.

This is why integrity in port operations must be seen as a **national imperative**.

Transparent, rule-based and predictable port processes are fundamental to:

- improving **Ease of Doing Business**,
- reducing **logistics and transaction costs**, and
- strengthening **India's credibility as a trusted and responsible maritime nation**.

“Integrity at ports is therefore not optional. It is central to India’s maritime growth story.”

Why ports are uniquely sensitive to corruption

- Ports involve **multiple agencies**, high discretion and time-sensitive operations
- Even small delays have **disproportionate economic impact**
- Ships are mobile and time-bound — coercive practices thrive under pressure

Link to national priorities

- **Ease of Doing Business**: Predictable port processes reduce uncertainty and informal costs
- **Logistics cost reduction**: Corruption adds hidden costs that inflate freight and insurance
- **Global credibility**: Flag, port and regulatory reputation directly influence trade choices

Strategic framing

- Corruption ≠ moral failure alone
- Corruption = **efficiency loss + safety risk + reputational damage**



MACN: A Strategic Partner



Maritime Anti-Corruption Network (MACN)

- Global, industry-led **collective action platform** addressing maritime corruption
- **220+ member companies**, representing ~60% of global shipping tonnage
- Recognised and referenced by the **International Maritime Organization (IMO)**
- Works through structured **public-private engagement** and evidence-led interventions
- Supports members with tools, reporting pathways and prevention measures

Why MACN Matters for India

- Helps identify **port-side risk points** using data and incident patterns
- Acts as a **neutral and trusted interface** between industry and government
- Complements national regulatory efforts through **data, collaboration and trust-based engagement**
- Accelerates **systemic solutions** that reduce discretion, delays and opacity
- Aligns with India's priorities on **transparency, governance and ease of doing business**

MACN strengthens governance outcomes through capacity building, collective action and integrity culture.

22nd December 2025

Slide 5 of 23

MACN: A Strategic Partner

This slide explains why MACN is not just another industry forum, but a strategic partner in addressing maritime corruption.

MACN is a global, industry-led collective action platform that brings together over 220 shipping companies, representing nearly 60 percent of global shipping tonnage. This scale gives credibility to the data, patterns and insights it generates.

Importantly, MACN is recognised and referenced at the International Maritime Organization, which places its work firmly within the global maritime governance ecosystem.

What makes MACN particularly relevant for regulators is its evidence-based approach. It does not work on anecdotes, but on structured incident reporting, trend analysis and practical prevention tools.

For India, MACN offers value in three key ways.

First, it helps identify port-side and ship-shore risk points using real operational data, allowing us to focus reforms where discretion and opacity are highest.

Second, it acts as a neutral and trusted interface between industry and government, enabling issues to be discussed constructively without attribution or confrontation.

Third, MACN's work complements national regulatory efforts by supporting collaboration, transparency and system-level solutions rather than isolated enforcement actions.

In this sense, engagement with MACN aligns well with India's broader priorities on transparency, good governance and ease of doing business, while also strengthening safety and trust across the maritime ecosystem.



MACN - Government Collaboration in India



Purpose of Engagement

- Address corruption risks across the maritime ecosystem—ports and ships
- Move from **incident-driven responses to systemic prevention**
- Protect **seafarer welfare, safety and dignity** alongside operational integrity

Mode of Engagement

- **Evidence-based inputs** from industry and seafarer experiences
- **Neutral, non-attributive platform** enabling open dialogue
- **Capacity building initiatives** for crews, companies and stakeholders
- Alignment with **international guidance and best practices**

Scope of Collaboration

- **Ports:** inspections, clearances, documentation and intermediaries
- **Ships:** crew exposure to coercion and informal demands
- **Training:** ethical and safe response by seafarers
- **Reporting:** secure, confidential escalation mechanisms

Value for India

- Strengthens **seafarer protection and confidence**
- Improves **consistency and credibility** of maritime governance
- Supports **Ease of Doing Business** and global trust in Indian ports
- Reinforces India's **zero-tolerance stance** through collaboration

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 6 of 23

MACN—Government Collaboration in India

This slide outlines how engagement with MACN is structured and why it is relevant in the Indian context.

The purpose of engagement is to address corruption risks across the entire maritime ecosystem—both at ports and on board ships. The intent is to move away from isolated, incident-driven responses and instead focus on systemic prevention. A key consideration throughout is the protection of seafarer welfare, safety and dignity, while maintaining operational integrity and regulatory effectiveness.

In terms of engagement, MACN operates as a neutral, non-attributive platform. This allows evidence-based inputs to be drawn from industry experience and seafarer feedback without naming or targeting individual agencies or officers. The emphasis is on open dialogue, capacity building and alignment with international guidance and best practices rather than fault-finding.

The scope of collaboration spans both port-side and ship-side realities. On the port side, this includes inspections, clearances, documentation and the role of

intermediaries. On the ship side, it recognizes the pressures faced by crews, including coercion and informal demands. Training and awareness are therefore essential, along with secure and confidential reporting and escalation mechanisms.

For India, this collaboration adds value by strengthening seafarer protection and confidence, improving consistency and credibility in maritime governance and supporting ease of doing business at Indian ports. Importantly, it reinforces India's zero-tolerance stance on corruption through structured, cooperative and system-level action."



MACN : The Three Cs Framework



Capacity Building

- Monitoring threats and reporting patterns
- Information sharing and awareness tools
- Strengthening internal compliance systems of member companies

Collective Action

- Sustainable collaboration with governments and port stakeholders
- Shared accountability across the maritime value chain
- Higher participation, stronger consistency in action on ground

Culture of Integrity

- Open dialogue with key stakeholders
- Building awareness of industry challenges
- Promoting integrity as an operating norm, not an exception

The Three Cs translate intent into systems, partnerships and behaviour change.

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 7 of 23

MACN : The Three Cs Framework

This slide explains the core framework through which MACN approaches maritime anti-corruption work, referred to as the Three Cs.

The first pillar is **Capacity Building**. This focuses on strengthening the ability of organisations and individuals to recognise and respond to corruption risks. It includes monitoring threat patterns, analysing incident data and sharing information and awareness tools. For member companies, this also means strengthening internal compliance systems so that responses are structured, consistent and aligned with best practices.

The second pillar is **Collective Action**. Corruption risks in the maritime sector often sit at shared interfaces—between ports, ships, agents and authorities. Collective action brings governments, port stakeholders and industry together to address these risks jointly. The emphasis is on shared accountability across the maritime value chain and ensuring higher participation and consistency in how issues are addressed on the ground.

The third pillar is **Culture of Integrity**. This focuses on long-term behavioural change. It involves open dialogue with key stakeholders, increasing awareness of industry challenges and promoting integrity as an operating norm rather than an exception. The objective is to embed ethical conduct into everyday decision-making rather than relying only on enforcement after incidents occur.

Taken together, the Three Cs translate intent into practical systems, partnerships and behavioural change, supporting sustainable and credible anti-corruption outcomes in the maritime sector.



Port-Side Corruption: Where Risks Arise



Pre-Arrival & Port Entry

- Arrival clearances
- Documentation submission
- Initial regulatory interface

Berthing, Cargo & Terminal Operations

- Berth allocation
- Cargo handling
- Terminal-level interactions

Statutory Inspections & Surveys

- Port State Control inspections
- Flag State / statutory surveys
- Interface with enforcement authorities

Documentation, Certification & Port Exit

- Clearance certificates
- Shore passes and crew movements
- Port departure formalities

Corruption risks emerge where discretion, delays and opacity intersect across port processes

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 8 of 23

Port-Side Corruption: Where Risks Arise

“To address maritime corruption effectively, we must first understand where and how risks arise.”

Port-side corruption does not occur randomly.

It tends to emerge at **predictable points across the port lifecycle**, where ships interact with multiple authorities under **time pressure and operational constraints**.

The first point of vulnerability is during **pre-arrival and port entry**, where documentation, clearances and initial regulatory interfaces take place. These are often time-sensitive processes, and any delay can have immediate operational consequences.

The second stage is **berthing, cargo and terminal operations**. Decisions relating to berth allocation, cargo handling and terminal-level interactions involve coordination across multiple stakeholders, which can create **points of discretion** if processes are not fully standardised.

The third stage is **statutory inspections and surveys**, including **Port State Control inspections** and **flag State or statutory surveys**. These inspections are critical for safety and compliance, but when discretion is misused, they can become points of pressure rather than protection.

The final stage is **documentation, certification and port exit**, including clearance certificates, shore passes and crew movements. Delays or lack of transparency at this stage can disrupt vessel schedules and crew welfare.

“Across all these stages, corruption risks emerge where discretion, delays and opacity intersect.”

This understanding is essential because it allows us to **design systemic solutions**, rather than reacting to isolated incidents.

Why a lifecycle approach matters

- It avoids blaming any single agency
- It shows corruption as a **process risk**, not a personnel issue
- It aligns with MACN’s methodology and international best practice

Why these four stages are critical

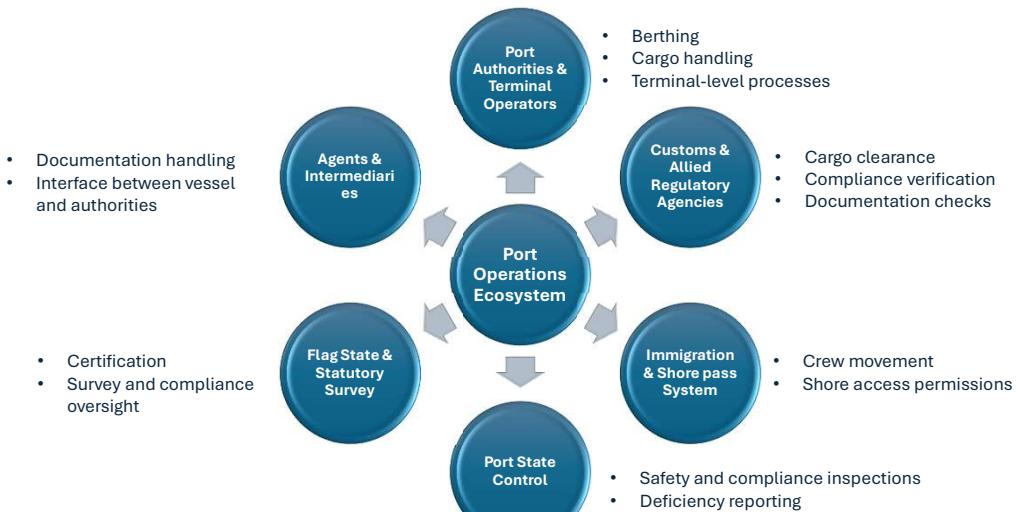
- **Pre-arrival & entry:** High paperwork load, regulatory interfaces, time pressure
- **Berthing & cargo:** Commercial urgency, coordination complexity
- **Inspections & surveys:** Enforcement authority + discretion = high-risk zone
- **Exit & documentation:** Crew welfare and vessel schedules most vulnerable

Corruption risk increases when:

- Decisions are **discretionary**
- Processes are **manual or opaque**
- Delays carry **financial or human cost**



Port-Side Corruption: Agencies & Interfaces



Integrity must be ensured across the entire port ecosystem — not in silos

22nd December 2025

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Maritime Anti-Corruption Network (MACN)

Slide 9 of 23

Port-Side Corruption: Agencies & Interfaces

*“Having identified where corruption risks arise across the port lifecycle, it is equally important to understand **how port operations actually function in practice.**”*

Ports do not operate in silos. They function as a **complex operational ecosystem**, where multiple public authorities, service providers and intermediaries interact with the same vessel during a single port call.

We are **deliberately presenting this as an ecosystem view, not an accusatory list**. Corruption risks do not belong to one agency alone. They typically arise **at interfaces**, especially where discretion, delays or lack of clarity exist.

At the centre of this ecosystem are **port authorities and terminal operators**, responsible for berthing, cargo handling and terminal-level sequencing. These are time-critical, commercially sensitive activities where predictability and transparency are essential.

Customs and allied regulatory agencies play a critical role in cargo clearance,

compliance verification and documentation checks. These functions are fundamental to trade facilitation. However, where processes are complex or inconsistent, they can become pressure points.

The **immigration and shore-pass system** directly affects crew movement and shore access. Delays or uncertainty here have an immediate impact on **seafarer welfare and dignity**, making this a particularly sensitive interface.

Port State Control inspections and flag State or statutory surveys are central to safety and compliance. These inspections must remain **objective, consistent and rule-based**, so that enforcement strengthens safety rather than becoming a source of coercion.

Finally, **agents and intermediaries** often act as the interface between vessels and authorities, coordinating documentation and clearances. Where systems are opaque, reliance on intermediaries increases, and with it, vulnerability.

“The key message is simple — integrity must be ensured across the entire port ecosystem, not in silos.”

From a governance standpoint, **the solution cannot be agency-specific**. Effective prevention requires **end-to-end integrity**, supported by standardisation, digitisation and accountability across interfaces.

From the **DGS perspective**, monitoring and assurance work best through a **hub-and-spoke model**:

- **Central oversight and policy direction at the hub**
- **Field-level enforcement and reporting at the spokes**
- **Clear escalation pathways back to the hub for review, corrective action and closure**

This approach avoids blame, reflects operational reality and reinforces coordinated reform.

Corruption risks increase when:

- Responsibilities overlap without clarity
- Accountability is fragmented
- Information is asymmetrical

Addressing these risks therefore requires **system-wide alignment**, not isolated interventions.

Port Authorities & Terminal Operators

- Berth allocation
- Cargo handling operations
- Terminal-level permissions and sequencing

Customs & Allied Regulatory Agencies

- Cargo clearance
- Compliance verification
- Import/export documentation checks

Immigration & Shore-Pass System

- Crew movement approvals
- Shore access permissions
- Crew welfare-linked clearances

Port State Control (PSC)

- Safety and compliance inspections
- Deficiency identification and reporting
- Detention decisions where applicable

Flag State & Statutory Survey Interfaces

- Certification issuance
- Statutory surveys and audits
- Compliance oversight

Agents & Intermediaries

- Documentation handling
- Coordination between vessel and authorities
- Process facilitation across agencies

Why this ecosystem framing is important

- Prevents attribution of blame to any one agency
- Reflects the **reality of port operations**
- Reinforces the need for coordinated reforms

Why intermediaries matter

- They emerge where processes are complex or opaque
- Reducing discretion and improving transparency reduces over-dependence

Corruption risk increases when:

- Responsibilities overlap without clarity
- Accountability is fragmented
- Information is asymmetrical



How Corruption Manifests in Practice



Observed Risk Patterns at Ports

- Threats of unjustified deficiencies or detention
(used as leverage rather than for safety enforcement)
- Deliberate procedural delays
(clearances, inspections or documentation)
- Cash and in-kind demands
(informal facilitation, goods or favours)
- Harassment or intimidation of crew
(particularly during inspections or shore access)
- Documentation and clearance bottlenecks
(created or prolonged artificially)

Primary Impact Areas

- Seafarers
 - Stress, intimidation and loss of dignity
- Ship Operators
 - Delays, uncertainty and increased costs
- Safety & Compliance
 - Real deficiencies overshadowed by misuse of process

These are illustrative patterns observed in port operations and are not agency specific.

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 10 of 23

How Corruption Manifests in Practice

“Having mapped the port ecosystem, it is important to understand how corruption actually manifests in day-to-day operations.”

Across ports, corruption does not usually appear as a single overt act. It manifests through **patterns of behaviour**, often subtle, that exploit discretion and time pressure.

One such pattern is the **threat of unjustified deficiencies or detention**, not as a genuine safety intervention, but as leverage. This undermines the credibility of enforcement and shifts focus away from real safety concerns.

Another common manifestation is **deliberate procedural delays** — in inspections, clearances or documentation — where time itself becomes a tool of pressure.

There are also instances of **cash and in-kind demands**, often framed informally as facilitation, goods or favours, rather than explicit monetary transactions.

Harassment or intimidation of crew, particularly during inspections or while seeking shore access, is a serious concern. Seafarers are often the most vulnerable stakeholders in port operations.

Finally, **documentation and clearance bottlenecks** may be artificially created or prolonged, increasing dependence on intermediaries and informal channels.

“The impact of these practices is not limited to one party.”

They place **significant stress on seafarers**, create **uncertainty and costs for ship operators**, and most importantly, **compromise safety and compliance** by diverting attention from genuine deficiencies.

Why these are called ‘patterns’

- They recur across ports and contexts
- They exploit **process design weaknesses**
- They are rarely isolated or random

Primary impact areas

- **Seafarers:** intimidation, stress, erosion of dignity
- **Operators:** delays, demurrage, unpredictability
- **Safety:** real risks overshadowed by misuse of process

Corruption thrives when:

- Processes are opaque
- Timelines are discretionary
- Accountability is fragmented

Why the disclaimer matters

- Protects institutions and individuals
- Reinforces that the focus is **systemic**, not agency-specific
- Keeps the discussion constructive and reform-oriented



Why Port-Side Corruption is a Serious Risk



Safety & Governance Impact

Safety compromised through manipulated or selective enforcement Uneven application of Port State Control undermines Regulatory capability



Human and Operational Impact

Mental stress, harassment and loss of dignity for seafarers Increased costs, delays and operational uncertainty for ship operators



Reputational & Security Impact

Erosion of trust in Indian port systems Reputational risk to India as a responsible maritime nation Corruption creates systemic vulnerabilities that can be exploited by illicit trafficking and organized crime networks

22nd December 2025

Slide 11 of 23

Why Port-Side Corruption is a Serious Risk

“This slide explains why corruption at ports cannot be viewed as a procedural or transactional issue.”

First, from a **safety and governance perspective**, corruption directly undermines regulatory intent.

When enforcement becomes selective or manipulated, safety outcomes are compromised. Equally concerning is the **uneven application of Port State Control**, which weakens the credibility and capability of the regulatory system as a whole.

Safety regulation works only when it is **predictable, rule-based and consistent**. Any deviation erodes trust in enforcement and dilutes deterrence.

Second, there is a clear **human and operational impact**.

For seafarers, corruption translates into stress, harassment and loss of dignity. These are not abstract concerns — they affect morale, decision-making and welfare on board.

For operators, corruption introduces **costs, delays and uncertainty**, distorting normal commercial operations and increasing reliance on intermediaries. Over time, this weakens compliance culture rather than strengthening it.

Finally, and most critically, there is a **reputational and security dimension**. Persistent corruption erodes trust in Indian port systems and creates reputational risk for India as a responsible maritime nation.

More importantly, corruption creates **systemic vulnerabilities**. These vulnerabilities can be exploited by illicit networks involved in smuggling, trafficking and organised crime, linking governance failures directly to security risks.

“The core message is this — corruption is not procedural. It is a safety, governance and security failure.”

Addressing it therefore requires **systemic prevention**, not isolated enforcement actions.



Corruption and Maritime Security: The Hidden Link



Why corruption becomes a security risk

- Weakens border controls and enforcement credibility
- Creates “paid bypass” routes for restricted goods and falsified clearances
- Enables organised crime through predictable informal channels

Possible spillovers

- Drugs and narcotics trafficking
- Arms and explosives movement
- Human trafficking and illegal migration facilitation
- Terror financing through illicit proceeds and cash ecosystems

Corruption is not only a governance failure. Over time, it can become a security vulnerability.

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 12 of 23

Corruption and Maritime Security: The Hidden Link

“This slide explains why corruption, if left unaddressed, migrates from a governance issue into a security vulnerability.”

Corruption in maritime interfaces does not remain confined to administrative inconvenience or procedural inefficiency. Over time, it **systematically weakens border controls and enforcement credibility**, which are foundational to maritime security.

When discretion and delays can be influenced, ‘**paid bypass**’ routes begin to emerge — whether through falsified documentation, selective clearances or informal facilitation. These routes erode the integrity of controls that are designed to regulate the movement of goods, people and vessels.

Once such informal pathways become predictable, they are **quickly exploited by organised crime networks**. What begins as isolated rent-seeking can evolve into structured, repeatable channels that sit outside formal oversight.

The spillover risks are well recognised:

- narcotics trafficking,
- arms and explosives movement,
- facilitation of illegal migration and human trafficking,
- and terror financing through illicit cash and parallel financial ecosystems.

“The maritime domain is particularly sensitive because of volume, velocity and cross-border complexity.”

Ports handle large cargo flows, multiple agencies and compressed timelines. Any compromise in integrity at this interface has **disproportionate downstream consequences** for national security.

From a governance standpoint, this reinforces a key principle: **corruption prevention is a preventive security function**, not merely a compliance or vigilance exercise.

“The core message is simple: corruption may start as a governance lapse, but if tolerated, it matures into a security vulnerability.”

This is why India’s zero-tolerance approach places emphasis on **system design, digitisation, standardisation and accountability**, ensuring that enforcement remains predictable, rule-based and resistant to manipulation.



Systemic Risk vs Individual Misconduct



Two distinct challenges — two distinct responses

Systemic Risk Factors

- High levels of discretion in processes
- Manual and paper-based workflows
- Opacity in procedures and decision-making

Individual Misconduct

- Bribery
- Coercion
- Harassment and intimidation

DGS Approach

- Reform systems to minimize discretion and opacity
- Zero tolerance towards individual misconduct

Systemic reform reduces opportunity; zero tolerance addresses intent.

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 13 of 23

Systemic Risk vs Individual Misconduct

“At this point, it is important to make a clear and necessary distinction.”

When we talk about corruption, we are actually dealing with **two distinct challenges**, and they require **two distinct responses**.

The first is **systemic risk**.

Systemic risks arise when processes involve **high levels of discretion**, rely on **manual or paper-based workflows**, or lack **transparency in procedures and decision-making**. These conditions do not automatically imply wrongdoing, but they **create vulnerabilities** that can be exploited.

The second is **individual misconduct**.

This includes acts such as **bribery, coercion, harassment or intimidation**. These are clear violations of law, ethics and professional conduct, and they **cannot be justified under any circumstances**.

It is important not to conflate the two.

Systemic weaknesses require **process reform**. Individual misconduct requires **firm and decisive action**.

This is precisely the approach adopted by the Directorate General of Shipping.

“We are reforming systems to minimize discretion and opacity, and at the same time, we maintain zero tolerance towards individual misconduct.”

Both strands must move together for sustainable change.

Why this distinction matters

- Avoids blaming individuals for structural failures
- Avoids excusing misconduct as a ‘system issue’
- Enables targeted and proportionate responses

Systemic risk indicators

- Manual approvals without audit trails
- Discretionary timelines
- Lack of standardized checklists or SOPs
- Limited visibility for senior oversight

Individual misconduct indicators

- Demands for cash or in-kind favours
- Threats or intimidation
- Selective application of rules
- Harassment of crew or operators

Governance logic

- Fixing systems **reduces opportunity**
- Enforcing accountability **addresses intent**
- Together, they create durable integrity



India's Institutional Response : Port Side



Zero-Tolerance Framework

- Integrity-based enforcement anchored in safety and compliance
 - Rule-based inspections with consistency and objectivity

Transparency & Standardization

- Digital inspection and reporting systems to reduce discretion
- Standard Operating Procedures (SOPs) for inspections and detentions with clear documentation

Oversight & Accountability

- Centralized monitoring & review of inspections
- Audit, oversight and officer rotation mechanisms to ensure fairness and consistency
 - Deterrence against misconduct through prompt action where established

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 14 of 23

India's Institutional Response : Port Side

This slide brings together India's institutional response to corruption in the maritime sector, particularly from a regulatory and enforcement standpoint.

The starting point is a **clear zero-tolerance framework**. From India's perspective, enforcement is not about discretion or negotiation; it is about **integrity-based, safety-anchored compliance**. Inspections are expected to be rule-based, objective and consistent, so that enforcement serves its intended purpose — protecting safety and compliance — and not as a pressure point.

The second pillar is **transparency and standardisation**. One of the most effective ways to reduce corruption risk is to reduce discretion. This is being addressed through **digital inspection and reporting systems**, along with **well-defined SOPs for inspections and detentions**. Clear documentation, traceability and predictable processes reduce ambiguity for both inspectors and ship operators.

The third pillar is **oversight and accountability**. Here, the emphasis is on **centralised monitoring and review of inspection actions**, supported by audit mechanisms and

officer rotation. This ensures consistency across ports and prevents the build-up of informal influence or familiarity risks. Where misconduct is established, **prompt action acts as a deterrent**, reinforcing credibility of the system.

Importantly, this framework is not punitive by default. It is designed to **separate systemic process reform from individual misconduct**, while ensuring that genuine safety enforcement is strengthened and protected.

The broader message is that India's approach is institutional, structured and preventive — focused on building trust, consistency and fairness across the maritime regulatory ecosystem.”



Corruption in Maritime Recruitment: The Impact of Fraud on Indian Seafarers



- India is among the world's **top five** seafarer-supplying nations, with an active workforce of nearly **3.2 lakh seafarers**.
- Rapid growth in seafarer numbers, combined with **limited employment opportunities**, has increased vulnerability to **recruitment fraud and exploitation**.
- To address these concerns, **Gujarat Maritime University (GMU)** and the **International Seafarers' Welfare and Assistance Network (ISWAN)** jointly conducted a study on the impact of recruitment fraud on Indian seafarers.

Drivers of Corruption	Supply Vs Demand	CDC Loophole*
	An imbalance between the high number of aspiring seafarers and the limited availability of legitimate contracts	Current policy allows seafarers to get a Continuous Discharge Certificate (CDC) with minimal training, creating an oversupply of underqualified candidates who cannot find legal work.

** The Directorate General of Shipping is working on a significant policy change on the issuance of Continuous Discharge Certificates (CDCs) in India. Through a new draft DGS Order, DG Shipping is aiming to discontinue the practice of granting Indian CDCs solely on the basis of completing the basic five STCW safety courses except for few sectors such as Cruise Lines.*

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 15 of 23

India is among the **top five seafarer-supplying nations globally**, with nearly **3.2 lakh active seafarers**, making it a major contributor to the international maritime workforce.

However, the **rapid increase in aspiring seafarers**, combined with **limited availability of legitimate contracts**, has created a structural imbalance. This gap has significantly increased exposure to **recruitment fraud, illegal agents, and exploitative practices**.

A study jointly conducted by **Gujarat Maritime University and ISWAN** highlights two key drivers of this problem.

First, the **supply–demand mismatch**, where far more candidates are entering the system than the market can absorb.

Second, the **CDC issuance framework**, which currently allows certification with minimal training, leading to an **oversupply of underqualified candidates** who struggle to find lawful employment.

Recognising this, the **Directorate General of Shipping** is working on a **policy reform** to tighten CDC issuance norms, moving away from granting CDCs solely on the basis of basic STCW courses, except in limited sectors.

These insights underline that recruitment fraud is a **systemic issue**, requiring policy correction alongside enforcement and awareness measures.



Seafarers face severe operational, legal, financial, and personal consequences due to corruption



Consequences of Corruption



22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 16 of 23

Seafarers Face Severe Consequences Due to Corruption

“This slide is important because it brings the discussion back to the **human cost of corruption**, which is often invisible in policy conversations.

For seafarers, corruption is not an abstract governance issue. It translates directly into **operational, legal, financial and personal consequences**, many of which can permanently damage a career and a family’s livelihood.

From an **operational and physical perspective**, corruption can result in vessels being forced to continue operations despite sub-standard conditions, poor living arrangements or unresolved safety deficiencies. In extreme cases, this leads to abandonment, prolonged onboard stays and serious risks to health and safety.

The **legal and career consequences** are equally severe. When corruption distorts inspections, documentation or clearances, seafarers often become collateral damage. Sea time may be invalidated, certifications questioned and visas complicated or denied. These outcomes are not just administrative setbacks — they can **break career progression built over years**.

Then there is the **financial and personal impact**. Informal demands, unpaid wages, mounting debts and prolonged uncertainty place immense pressure on seafarers and their families. The stress, anxiety and loss of dignity that follow are real and long-lasting.

The key point here is that **seafarers are rarely the cause of corruption**, but they are very often the ones who suffer its consequences most directly.

This is why, from the DGS perspective, tackling corruption is also a matter of **seafarer welfare, safety and dignity**, not just compliance or enforcement. Any effective anti-corruption framework must therefore place seafarers at the centre — protecting them, empowering them and ensuring they are not forced to navigate informal systems to simply do their job.”



DG Shipping is Strengthening Enforcement, Transparency, and Seafarer Welfare



Heavy Fines for Fraudulent Practices

- Strict DG Shipping enforcement against maritime fraud
- Heavy penalties for fake certificates and illegal recruitment
- Deterrence of unethical practices
- Protection of India's maritime credibility

Blacklisting of Invalid RPSLs

- DG Shipping identifies and blacklists fraudulent or non-compliant RPSL agencies
- Blacklisted agencies barred from recruitment activities
- Public notifications raise awareness among seafarers
- Ensures transparency and prevents illegal recruitment

Scheme for Stranded/Abandoned Seafarers

- Seafarers' Welfare Fund Society (SWFS) introduces the Ex-Gratia Support Benefit Scheme (ESBS)
- Provides financial relief to families of stranded or abandoned seafarers
- Ensures timely support to affected families
- Reinforces Government's commitment to seafarer welfare and protection

24x7 Grievance Redressal Module

- Grievances currently managed physically by a dedicated team
- 24x7 Digital Grievance Redressal Module under development
- Features:
 - Online lodging of complaints
 - Categorization & routing to authorities
 - Tracking of grievance status
 - Timely resolution & feedback
- Enhances transparency, accountability, and responsiveness
- Ensures seafarers' concerns are addressed promptly and effectively

Addressing recruitment corruption requires a multi-faceted approach involving legislative changes, better enforcement, and intensive awareness campaigns for young seafarers.

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 17 of 23

DG Shipping is Strengthening Enforcement, Transparency and Seafarer Welfare

“This slide highlights how the Directorate General of Shipping is translating policy intent into **concrete enforcement and welfare measures**, particularly in areas where seafarers are most vulnerable.

First, on **fraudulent practices**, DG Shipping has adopted a strict enforcement posture. This includes **heavy financial penalties** for fake certificates, illegal recruitment and misrepresentation. The objective is deterrence — to make it clear that unethical practices will carry real consequences, and to protect India's credibility as a responsible maritime nation.

Second, **blacklisting of invalid or non-compliant RPSLs** is a critical transparency measure. DG Shipping actively identifies and bars such agencies from recruitment activities. These actions are backed by **public notifications**, ensuring that seafarers are informed and can avoid illegal or exploitative intermediaries. This directly addresses one of the most common entry points of corruption affecting young seafarers.

Third, on **stranded and abandoned seafarers**, the Seafarers' Welfare Fund Society has operationalised the **Ex-Gratia Support Benefit Scheme**. This provides financial relief to families when seafarers are stranded or abandoned abroad. The intent here is clear — to ensure that families are not left without support while cases are being resolved, and that welfare is treated as a responsibility, not an afterthought.

Finally, on **grievance redressal**, DG Shipping currently manages complaints through a dedicated team, with a **24x7 digital grievance redressal module under development**. This system will allow online lodging of complaints, structured routing to the appropriate authority, tracking of grievance status and time-bound resolution. Once operational, it will significantly strengthen transparency, accountability and responsiveness.

Taken together, these measures reflect a **multi-faceted approach** — combining enforcement, transparency, welfare support and digital systems.

The underlying message is simple: addressing recruitment-linked corruption and seafarer exploitation requires **strong regulation, effective enforcement and accessible grievance mechanisms**, supported by sustained awareness among seafarers.

DG Shipping remains committed to ensuring that seafarers are protected, unethical practices are deterred and trust in India's maritime governance framework is continuously strengthened.”



Transparency and Zero Tolerance for Fraud



Raising issue over the Call/SMS/WhatsApp

Helpline between 09:00 AM – 06.00 PM

Escalation mechanism for resolving query

Follow-up
Support and right guidance

Analysis & Correction and recurrence

Efforts to provide awareness through Social Media



22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 18 of 23

Transparency and Zero Tolerance for Fraud

“This slide explains how DG Shipping has put in place a **clear, accessible and accountable mechanism** to deal with complaints, fraud and misconduct, particularly in the context of recruitment and training.

At the first level, **any stakeholder or seafarer can raise an issue directly** through multiple channels — **call, SMS or WhatsApp**. The emphasis here is on ease of access. Reporting does not require intermediaries, influence or formal representation.

A dedicated helpline operates between 9:00 AM and 6:00 PM, ensuring that complaints are received and acknowledged within defined working hours by an identified team. This removes ambiguity about where and how issues should be reported.

Where matters require further examination, a **structured escalation mechanism** is in place. Complaints are not left unresolved at the frontline level and are routed appropriately for review and decision-making.

This is followed by **systematic follow-up**, where complainants are provided **support and correct guidance**, particularly in cases involving training eligibility, recruitment processes or certification-related concerns. The objective is not only resolution, but also prevention of repeat vulnerability.

Finally, DG Shipping undertakes **analysis and corrective action**. This includes identifying patterns, addressing systemic gaps and ensuring that similar instances do not recur. This feedback loop is critical to strengthening institutional integrity.

In parallel, DG Shipping has made **extensive use of social media and public communication** to raise awareness among seafarers. Regular posts, advisories, event outreach and helpline information are disseminated to ensure that seafarers — especially young entrants — are informed, alert and empowered.

The overarching message is clear and consistent: **there is zero tolerance for fraud**, reporting channels are open and accessible and DG Shipping stands firmly on the side of transparency, fairness and seafarer protection.”



Reporting, Redressal & Whistleblower Protection



CLEAR MESSAGE

There is no justification for informal payments — ever



DGS ASSURANCE

Complaints are examined objectively and without prejudice
No adverse action for reporting in good faith
Whistleblowers are protected through institutional safeguards



ENABLERS

Confidential Reporting Secure and confidential channels Protection of identity	Collaborative Support Collaboration with MACN Help Desk Structured handling of reported incidents	Timely Resolution Time-bound escalation Monitoring until closure
--------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Reporting, Redressal & Whistleblower Protection

This slide communicates a **clear and unequivocal message** from the regulator — **there is no justification for informal payments, ever**. No matter the circumstance, no matter the perceived urgency, informal payments are not acceptable and should not be normalised.

At the same time, it is important to assure stakeholders that **raising concerns is safe, legitimate and encouraged**. From the DGS perspective, complaints are examined **objectively and without prejudice**, based on facts and evidence, not assumptions. There is **no adverse action** for reporting issues in good faith.

Whistleblower protection is not informal or ad hoc. It is supported through **institutional safeguards**, ensuring confidentiality of identity and protection against retaliation. This applies equally to seafarers, operators and other stakeholders engaging with the system.

The third element is about **enablers that make this framework work in practice**. First, there are **secure and confidential reporting channels**, which allow issues to be

raised without fear.

Second, there is **collaborative support**, including structured engagement with the **MACN Help Desk**, which provides an additional, trusted pathway for reporting and early issue identification.

Finally, there is an emphasis on **timely resolution**. Complaints are not meant to disappear into the system. They follow **time-bound escalation mechanisms**, with monitoring until closure, so that outcomes are visible and confidence in the process is maintained.

The overall intent is to move from silence and informal coping mechanisms to **confidence in formal systems** — where integrity is protected, concerns are addressed and trust in maritime governance is strengthened.”



Global Tools and Standards that Support Integrity



Internationally Recognised Reference Frameworks

ISO 37001 – Anti-Bribery Management Systems

- Provides a **structured organisational framework** to prevent bribery
- Requires **leadership commitment, clear policies and accountability**
- Mandates **risk assessment, training and third-party due diligence**
- Enables **reporting, investigation and corrective action**
- Focus:** Prevent, detect and respond to bribery within organizations

IMO (International Maritime Organization) – FAL 44/13

- Recognizes corruption as a risk to safety, **compliance and fair enforcement**
- Promotes **risk-based identification** of corruption-prone port interfaces
- Emphasizes **transparent procedures, documentation and reporting**
- Encourages cooperation across **flag State, port State, industry and seafarers**
- Focus:** Operational integrity in port and inspection processes
UN SDG Relevance : SDG 16 (Peace, Justice and Strong Institutions) – **SDG 16.5 Substantially Reduce Corruption and Bribery.**

OECD – Anti-Bribery Frameworks

- Establishes **international standards against bribery**
- Strengthens **corporate liability and enforcement cooperation**
- Supports **cross-border investigations and information sharing**
- Reinforces **integrity across global supply chains**
- Focus:** Accountability, enforcement cooperation and a level playing field

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 20 of 23

Global Tools and Standards that Support Integrity

“This slide situates India’s integrity efforts within globally recognised governance frameworks.”

Maritime integrity is not being approached in isolation. Internationally, there is a **clear convergence around treating corruption as a safety, governance and enforcement risk**, not merely an ethical concern.

The **IMO**, through its Facilitation Committee, explicitly recognises corruption risks at port interfaces and calls for **risk-based identification, transparency in procedures and cooperation across flag State, port State, industry and seafarers**.

At the organisational level, **ISO 37001** provides a structured, auditable framework for companies to **prevent, detect and respond to bribery**, embedding leadership accountability, risk assessment and reporting mechanisms into daily operations.

Complementing this, **OECD anti-bribery frameworks** address the cross-border dimension of corruption by strengthening **corporate liability, enforcement**

cooperation and information sharing, ensuring that integrity expectations are consistent across jurisdictions.

“Together, these frameworks reinforce a common principle: integrity must be system-led, evidence-based and internationally aligned.”

For India, alignment with these standards strengthens **credibility, predictability and trust**, while ensuring that domestic reforms are fully interoperable with global shipping and trade systems.

IMO (International Maritime Organization) – Guidance on Addressing Bribery and Corruption (FAL 44/13)

The International Maritime Organization formally recognises bribery and corruption as risks that directly undermine **maritime safety, regulatory compliance and fair enforcement**. Through its guidance to the Facilitation Committee (FAL), particularly document FAL 44/13, IMO highlights that corruption is not merely an ethical concern but a **systemic operational risk** within port and inspection environments

IMO’s guidance places strong emphasis on a **risk-based approach**, encouraging States and maritime administrations to identify interfaces that are most vulnerable to corruption. These include inspections, clearances, documentation processes and interactions involving intermediaries. The objective is to reduce discretion and unpredictability at these touchpoints through **standardisation, transparency and clear procedures**.

A key principle in the IMO framework is **procedural transparency**. The guidance encourages clear articulation of roles and responsibilities of port officials, inspectors and authorities, along with documented procedures, defined timelines and accessible reporting mechanisms. This is intended to ensure that enforcement actions remain safety-driven and rule-based rather than discretionary or negotiable.

IMO also underscores the importance of **cooperation across the maritime ecosystem**. Flag States, port States, industry, ship operators and seafarers are all recognised as stakeholders in addressing corruption risks. By encouraging information sharing and coordinated action, IMO seeks to reduce fragmentation and prevent isolated practices that enable informal or coercive behaviour.

Overall, the IMO framework provides **sector-specific governance guidance**, anchoring anti-corruption efforts firmly within the operational realities of ports,

inspections and vessel operations, rather than treating corruption as a generic compliance issue.

ISO 37001 – Anti-Bribery Management Systems

ISO 37001 provides a **structured organisational framework** for preventing, detecting and responding to bribery through the establishment of an Anti-Bribery Management System (ABMS). Unlike sector-specific guidance, ISO 37001 focuses on how organisations design and operate **internal control systems** to address bribery risks in a systematic manner .

The standard requires **leadership commitment** at the highest level, making anti-bribery responsibility a governance issue rather than a purely compliance function. Organisations are expected to define clear anti-bribery policies, assign responsibilities, and embed accountability mechanisms across management and operational levels.

A core element of ISO 37001 is **risk assessment**. Organisations must periodically assess bribery risks based on their activities, geographic exposure, use of intermediaries and interaction with public officials. These assessments then drive proportional controls, ensuring that measures are risk-based rather than purely procedural.

ISO 37001 places strong emphasis on **training and awareness**, requiring organisations to ensure that employees, management and relevant third parties understand bribery risks, reporting obligations and ethical expectations. This is particularly relevant in maritime operations, where crews, agents and port-side staff often operate across jurisdictions and regulatory environments.

The standard also mandates **third-party due diligence**, recognising that agents, intermediaries and service providers are common risk vectors. In addition, ISO 37001 requires confidential reporting mechanisms, investigation procedures and corrective actions, enabling organisations to move from intent to **operational enforcement**.

While ISO 37001 does not replace national laws or enforcement, it provides a globally recognised management system that supports **consistency, auditability and continuous improvement** in anti-bribery controls.

OECD – Anti-Bribery Frameworks and Convention

architecture for combating bribery of foreign public officials in international business transactions. It is a legally binding framework that requires signatory countries to criminalize bribery and ensure effective investigation, prosecution and sanctions.

A defining feature of the OECD framework is its focus on **corporate liability**. Companies, not just individuals, can be held accountable for bribery committed on their behalf. This is particularly relevant in maritime trade and shipping, where complex corporate structures and cross-border operations are common.

The OECD framework promotes **cross-border enforcement cooperation**, including information sharing, mutual legal assistance and coordinated investigations. This recognises that bribery and corruption often span jurisdictions, supply chains and financial systems, making unilateral enforcement ineffective.

Through its **peer-review monitoring mechanism**, the OECD evaluates how effectively member countries implement and enforce anti-bribery laws. These reviews focus not only on legislation but also on real-world enforcement outcomes, thereby reinforcing accountability and credibility.

From a governance perspective, the OECD framework reinforces the principle of a **level playing field**, ensuring that companies operating ethically are not disadvantaged by competitors engaging in bribery. It supports integrity across global supply chains and strengthens trust in international trade systems.

In the maritime context, OECD principles complement sectoral and organisational frameworks by providing the **legal and enforcement backbone** that deters bribery, supports prosecution and reinforces international cooperation.



India's Zero-Tolerance Stance: Corruption as a National Security Risk



Prime Minister's Stance on Corruption

- **Zero tolerance against corruption** as a core governance principle
- **Technology-led transparency** to eliminate rent-seeking and discretion
- **Time-bound action and accountability** embedded in administration
- Corruption viewed not merely as misconduct, but as a **systemic threat**



Corruption is not an isolated governance issue, it is a multiplier of crime and a direct risk to national security.

22nd December 2025



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Relevant PIB Press Releases

1. PM's Address at Vigilance Awareness Week, Vigyan Bhawan, 03 November 2022 | 3:13 PM
2. PM Addresses G20 Anti-Corruption Ministerial Meet (Kolkata), 12 August 2023 | 9:29 AM
3. PM's Reply to Motion of Thanks on President's Address (Lok Sabha), 02 July 2024 | 8:46 PM
4. BRICS Anti-Corruption Ministerial Meet – India's Position, 13 July 2022 | 6:06 PM
5. Governance Reforms under PM Modi – Statement by Dr Jitendra Singh, 15 February 2024 | 6:02 PM
6. Union Home Minister Shri Amit Shah on Extradition of Fugitives & National Security, 16 October 2025 | 4:06 PM

Slide 21 of 23

India's Zero-Tolerance Stance: Corruption as a National Security Risk

"This slide situates maritime anti-corruption within India's broader national governance and security doctrine."

The Government of India, under the leadership of the Hon'ble Prime Minister Shri Narendra Modi, has articulated **zero tolerance against corruption as a core principle of governance**, not as a sector-specific initiative.

Across multiple national and international platforms — including **Vigilance Awareness Week**, the **G20 Anti-Corruption Ministerial Meet**, **BRICS engagements** and **Parliamentary addresses** — corruption has been consistently framed as a **systemic threat** that undermines trust, distorts markets and weakens institutions.

A key emphasis in the Prime Minister's PIB-recorded statements is that **corruption thrives where discretion, opacity and delays exist**. The policy response therefore focuses on **technology-led transparency, process standardisation and time-bound decision-making** to eliminate rent-seeking opportunities.

Importantly, corruption is **not viewed merely as administrative misconduct**, but as a **multiplier of broader security risks**.

The domino illustration on the slide captures this clearly:
corruption weakens controls → criminal networks exploit gaps → smuggling, trafficking and illicit trade expand → terror financing and organised crime gain pathways → national security comes under stress.

This framing has been reinforced not only by the Prime Minister but also by senior ministers, including in PIB statements linking **corruption, economic offences, terrorism, arms smuggling and organised crime** as interconnected risks.

“From India’s perspective, zero tolerance is therefore not symbolic — it is structural.”

It is reflected in:

- technology-enabled governance,
- strengthened enforcement and asset recovery,
- reduced human discretion,
- and clear accountability mechanisms.

For the maritime sector, this means that **anti-corruption measures are directly aligned with national security, trade integrity and India’s global credibility as a responsible maritime nation.**

“The message is unambiguous: corruption is not an isolated governance issue — it is a direct risk to safety, security and sovereignty.”



Strengthening Maritime Integrity: The Way Forward



Systemic & Institutional Measures

- Reduce discretion through **digitalization and SOP-driven processes**
- Automate documentation, clearances and customs interfaces
- Strengthen oversight, audits and inspector rotation
- Use data and incident reporting to identify risk patterns and drive reform

People, Training & Culture

- Build a **zero-tolerance culture** across ports, ships and companies
- **Train seafarers, inspectors and port stakeholders** on ethical response and rights
- Empower crews with **confidence, awareness and escalation pathways**
- Encourage **political and leadership commitment** for sustained change

Collaboration, Technology & Accountability

- **Collective action:** government, industry and seafarers
- **Safe reporting:** confidential channels and whistleblower protection
- **Technology enablement:** digital platforms, automation and remote monitoring
- **Transparency:** tools to track processes and interactions
- **Alignment:** international standards and best practices

22nd December 2025

Public – Private Dialogue on
Maritime Anti-Corruption Network (MACN)

Slide 22 of 23

Strengthening Maritime Integrity: The Way Forward

“This slide brings together the key actions required to address maritime corruption in a comprehensive and sustainable manner. The emphasis is not on isolated enforcement, but on strengthening systems, people and accountability across the maritime ecosystem.”

Systemic & Institutional Measures

At the core of integrity reform is reducing discretion. Wherever manual processes, ambiguity and delays exist, the risk of corruption increases. Our focus therefore is on digitalisation and SOP-driven processes, particularly in inspections, documentation, clearances and customs interfaces.

Automation and standardisation help ensure that enforcement is rule-based, consistent and transparent, rather than personality-driven. Alongside this, strong oversight mechanisms, audits and inspector rotation are essential to prevent collusion and maintain credibility.

Data and incident reporting play a critical role here. When analyzed properly, they

help us identify systemic risk patterns and enable targeted reforms rather than ad-hoc reactions.

People, Training & Culture

Integrity systems will not succeed unless they are supported by people and culture. Building a zero-tolerance culture across ports, ships and companies is therefore fundamental.

Training is not limited to compliance awareness. It is about equipping seafarers, inspectors and port stakeholders with clarity on ethical conduct, rights, responsibilities and escalation mechanisms.

Seafarers, in particular, often face pressure at the front line. Empowering them with confidence, awareness and safe escalation pathways is as much a welfare issue as it is a governance issue.

Finally, sustained change requires leadership commitment — political and administrative — to ensure that integrity reforms are consistently supported over time.

Collaboration, Technology & Accountability

Maritime corruption cannot be addressed by any single actor. Collective action involving government, industry and seafarers is essential to address shared risks.

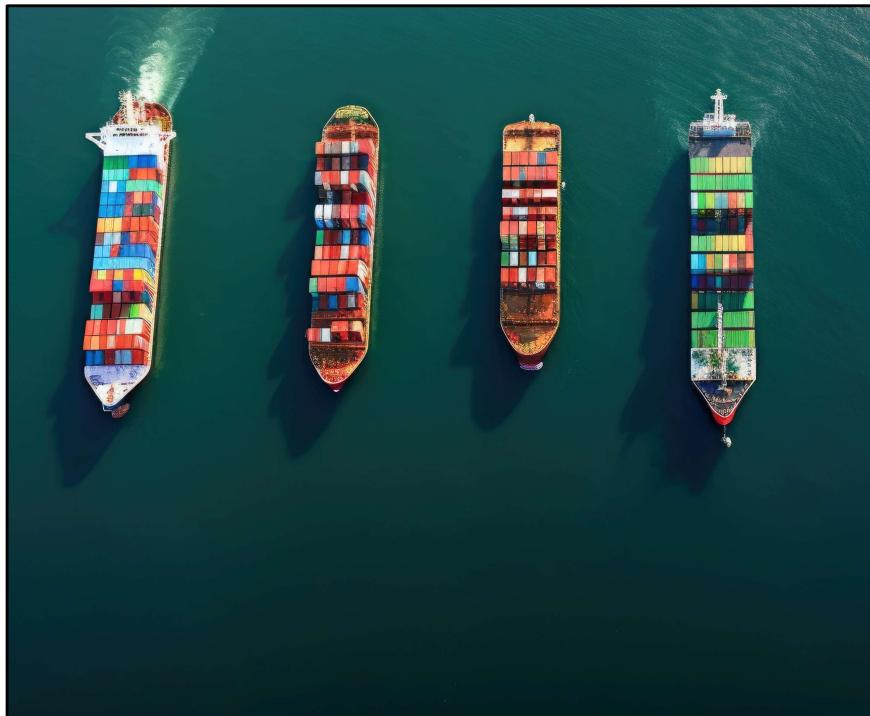
Safe and confidential reporting mechanisms, along with whistleblower protection, are critical to ensure that concerns are raised without fear of retaliation.

Technology is a strong enabler — digital platforms, automation and remote monitoring reduce human discretion and improve traceability. Transparency tools allow processes and interactions to be tracked, reviewed and audited.

Alignment with international standards and best practices ensures that our approach remains credible, interoperable and globally trusted.

Closing

Ultimately, maritime integrity is strengthened not through one-time actions, but through robust systems, empowered people and sustained collaboration.



**“Integrity is not optional —
It is the bedrock of safe and
effective maritime
governance.”**

Thank you

