NEWS BRIEF

MEPC 82

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The IMO Marine Environment Protection Committee (MEPC) held its 82nd session from September 30 to October 4, 2024. This Brief provides an overview of the more significant issues progressed at this session.

KEY DEVELOPMENTS

- Progression of the IMO Net-Zero Framework
- Review plan of the short-term GHG reduction measures
- Information on the availability of biofuels at port
- EEXI and engine/shaft power limitation system
- Adoption of the Canadian Artic Waters and Norwegian Sea ECAs

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CONTENTS *(CLICK TO FOLLOW)*

IMO STRATEGY ON GHG EMISSIONS

Outcome of Intersessional Working Group on Reduction of Greenhouse Gas (GHG) Emissions from Ships (ISWG-GHG 17)

The Intersessional Working Group on Reduction of GHG Emissions from Ships (ISWG-GHG 17) was held back-to-back with MEPC 82 from 23 to 27 September 2024 and worked on the following:

- Further development of candidate mid-term measures
- Further development of the Life Cycle GHG Assessment (LCA) framework
- Development of draft terms of reference for the fifth IMO GHG Study

Further Development of Candidate Mid-Term Measure(s)

The group agreed to use the draft possible outline of the "IMO net-zero framework" as the basis for the development of draft amendments to MARPOL Annex VI, and to progress the development of the basket of measures in the following structure:

1. Application, goal and functional requirements of the new Chapter 5 on the IMO net-zero framework
2. Goal-based marine fuel standard regulating the phased reduction of the marine fuel's GHG intensity, including alternative compliance approaches
3. Economic mechanism(s) to incentivize the transition to net-zero and the structure and basic functions of central management, oversight, collection and distribution of revenue (a "Fund")
4. Definitions, survey, certification and data collection
5. List of new guidelines to further develop and existing guidelines to amend

Provisions on Application, Goal and Functional Requirements

During extensive discussion, the group noted agreement that the regulations should apply to all ships of 5,000 GT and above and that, from a calendar year to be determined, the provisions could apply to all ships of 400 GT and above. There was general support for the exclusion of ships solely engaged in domestic voyages and possibly platforms, including FPSOs, FSUs and drilling rigs. Furthermore, there was a need to address non-party ships and changes of flag and/or company.

For the ‘goal’ provisions, there was general alignment towards using a reference to the relevant text of the 2023 IMO GHG Strategy, while the provisions on the functional requirements would be revisited at a later stage.

Goal-Based Marine Fuel Standard Regulating the Phased Reduction of the Marine Fuel's GHG Intensity, Including Alternative Compliance Approaches

Regarding the attained GFI, target/required GFI, and GFI data collection and reporting, the group considered the start date of GFI implementation, the calculation method for the GFI and reference GFI value taking into account well-to-wake (WtW) emissions and the LCA Guidelines, the reduction factor trajectory time periods (each year or every few years), and how to align these with the "base" and "strive" scenarios in the Strategy. The group noted convergence on the overall implementation mechanism of the GFI, the equation to determine the target/required GFI, the need to develop appropriate GFI data collection, reporting and verification mechanisms, and monitoring of the uptake of zero and near-zero GHG emission technologies, fuels and/or energy sources, etc.

The group considered the need for alternative compliance approaches in the GFS, as several proposals do not foresee a GFI flexibility mechanism. For those proposals, including a GFI flexibility mechanism, the group considered compliance of a ship with the GFS requirements, treatment and functioning of surplus compliance units and deficit units/remedial units, and the methods of quantification, calculation and pricing, and balancing mechanism.

Relating to the Central GFI Registry, the group considered the information to be submitted to the registry, the reporting periods and the responsible entities to submit the data (Administration or company). For those delegations supporting the GFI flexibility mechanism, an agreement was noted that the Central GFI Registry would be a platform to manage and oversee the movement of "GFI Units."

Economic Mechanism(s) to Incentivize the Transition to Net-Zero and Basic Functions of Central Management, Oversight, Collection and Distribution of Revenue (a "Fund")

The group considered the facilitation of the energy transition of shipping with the required incentive while maintaining a level playing field and a just and equitable transition. The discussions found commonalities in the support for the inclusion of an economic element in the IMO net-zero framework to incentivize the energy transition of international shipping, the acknowledgment that all proposals envisioned a form of collection of payments and distribution of revenues, the need to further work on a framework for the disbursement of revenues and the preference for the establishment of a fund under the remit/oversight of the IMO.

Definitions, Survey, Certification and Data Collection (Amendments to Chapters 1 to 4 of MARPOL Annex VI)

The group considered how the GFI requirements should be linked with existing requirements under regulations 26 (SEEMP) and 27 (DCS), what new information should be added in the SEEMP and be reported through the DCS database, the link between the GFI registry and the DCS database, the procedure for the issuance of the statements of compliance, survey requirements and verification during port State control inspections.

List of New Guidelines to Further Develop and Existing Guidelines to Amend

The group noted that it was premature to discuss or even assemble a list of draft guidelines before the design of the basket of mid-term measures had been agreed upon.

Further Development of the Life Cycle GHG Assessment (LCA) Framework

After the adoption of the 2024 Guidelines on the life cycle GHG intensity of marine fuels (2024 LCA Guidelines, Resolution MEPC.391(81)), MEPC 81 established a GESAMP Working Group on Life Cycle GHG Intensity of Marine Fuels to review scientific and technical issues. Interested member States and international organizations were invited to prepare proposals for default emission factors in order to allow the GESAMP-LCA group to review them after MEPC 83 and continue working on the development of a sustainable fuels certification framework, including draft guidelines, with a view to submitting a more developed proposal to a future session.

Development of a Sustainable Fuels Certification Framework

The group considered recommendations regarding the development of a sustainable fuels certification framework, including draft guidelines. Interested parties were invited to submit concrete proposals to a future session on how to reference certification schemes and the fuel life cycle label (FLL) in the draft legal text of the IMO net-zero framework and associated guidelines.

Development of Draft Terms of Reference for the Fifth IMO GHG Study

MEPC 81 had noted general support to initiate the fifth IMO GHG Study and requested the secretariat to submit a proposal with draft terms of reference, suggested timelines, logistics and administrative arrangements to MEPC 82. The study should include aspects of additional climate-impacting emissions and indirect GHG emissions, such as black carbon, volatile organic compounds, fugitive hydrogen emissions and measure ambient Underwater Radiated Noise (URN) to inform synergies between energy efficiency and URN. Following consideration, the committee noted the discussion and requested the secretariat to submit to MEPC 83 revised draft terms of reference and associated logistical arrangements for the Fifth IMO GHG Study, taking into account relevant documents and the comments made during ISWG-GHG 17.

The Committee Consideration of the Development of the Basket of Candidate Mid-Term GHG Reduction Measures

MEPC 82 considered the development of the basket of mid-term measures based on the draft amendments to MARPOL Annex VI for the IMO net-zero framework as received from the ISWG-GHG 17. Based on the draft text, the Working Group on Reduction of GHG Emissions from Ships held the following discussions:

Attained Annual GHG Fuel Intensity (Attained Annual GFI)
Noting similarities between the different options, the group agreed to further streamline the text, particularly the equation dedicated to the calculation methodology for the required GFI. It was noted that it was premature to identify possible compromise text on other elements, such as how to take into account the WtW emissions of marine fuels or proposals to include provisions and variables in the equation related to a possible correction factor for ships serving ports of developing countries.

Target/Required Annual GHG Fuel Intensity (Target/Required Annual GFI
The group discussed if the regulation should set a 'target' or a 'required' annual GFI, how the value of the reduction factor (Z factor) should be determined and if its trajectory should be set for each individual year or on a periodical time base. Recognizing that the Z (reduction) factor would be the key element of the GFS mechanism, the group considered it premature to consider concrete values for the reduction factor as the value should be determined taking into account the full design of the net-zero framework and the technical and economic elements contained therein.

Central Oversight/Management of a Fund/Facility and Collection of Revenue
With regards to the governance of the fund, the group generally agreed that oversight of the fund/facility should fall under the remit of the organization. Divergences remained on which entity within the organization should be responsible, e.g., the MEPC, the council, the assembly or a combination of these entities. On the composition of the board of a fund/facility, the group emphasized the need for transparency, accountability and good governance of revenue management, and the need for a balanced geographical representativeness of its membership.

Distribution of Revenue
The group discussed possible operational revenue distribution modalities and areas of disbursement, eligibility of non-party ships, and what elements could be contained in MARPOL Annex VI, acknowledged that defining the legal, financial and operational requirements associated with the establishment of a fund/facility and associated oversight would require substantial time. Further considerations should focus on the essential elements to be included in the text of MARPOL Annex VI, as there would be time to work on the details of these elements between the adoption of the amendments and the effective start date of the operations/disbursement of a fund/facility.

Economic Mechanism(s) to Incentivize the Transition to Net-Zero
The group further considered the options for (an) economic mechanism(s) to incentivize the transition to net-zero but considered it premature to replace the respective text options with any streamlined text proposals which constitute "work in progress."

Other Regulations
Due to the limited time available at this session, the group was unable to work on possible convergence of text options under the regulation on (alternative) compliance approaches.

IMO Net-Zero Framework

The structure of the draft amendment to MARPOL Annex VI, with the new chapter 5 for the regulations on the IMO net-zero framework, was further developed and refined. The current draft text includes options for the provisions of the mid-term measure(s), which remain to be determined:

Chapter 1 – General

1. Definitions (regulation 2)

Chapter 2 – Survey, Certification and Means of Control

2. Surveys (regulation 5)
3. Certificates and Statements of Compliance (regulation 6)
4. Form of Certificates and Statements of Compliance (regulation 8)
5. Duration and validity of Certificates and Statements of Compliance (regulation 9)
6. Port State Control and operational requirements (regulation 10)

Chapter 4 – Regulations on the Carbon Intensity of International Shipping

7. SEEMP (regulation 26)
8. Data Collection System (regulation 27)

New Chapter 5 – Regulations on the IMO Net-Zero Framework

9. **New Chapter 5.1: Goal-Based Marine Fuel Standard Regulating the Phased Reduction of the Marine Fuel's GHG Intensity**
    1. Application (regulation X)
    2. Goal (regulation X)
    3. Functional requirements (regulation X)
    4. Attained annual GHG fuel intensity (GFI) (regulation X)
    5. Target/equired GFI (regulation X)
    6. GFI data collection and reporting (regulation X)
    7. Alternative compliance approaches (regulation X)
    8. IMO GFI Registry (regulation X)
    9. Uptake of zero or near-zero GHG emissions technologies, fuels and/or energy sources (ZNZs) (regulation X)
    10. Synergies with existing measures (regulation X)
10. **Economic Mechanism(s) to Incentivize the Transition to Net-Zero (Regulation X)**
    (Options for Calculation, Collection of Contributions by Ships)
    1. Review and Ratchet of the Levy and Surcharge (regulation X)
    2. Collection of economic contribution by ships (regulation X)
    3. Central management/oversight of collected revenue (regulation X)

    (Options for the Funds)
    4. The Research, Development and Deployment Committee (regulation X)
    5. Distribution of Revenue (regulation X)

    (Options for the Distribution of Revenues)
11. **Dates of Implementation (regulation X)**

Terms of Reference for Intersessional Work

In order to progress the development of candidate mid-term measures intersessionally, the committee approved the terms of reference for the Intersessional Working Group on Reduction of GHG Emissions from Ships to:

1. Further consider the development of the basket of candidate mid-term GHG reduction measure(s), using annex 1 to document MEPC 82/WP.9 as the basis
2. Further consider the development of the IMO Life Cycle GHG Assessment (LCA) framework
3. Submit a written report to MEPC 83

Comprehensive Impact Assessment (CIA) of the Basket of Candidate Mid-Term GHG Reduction Measures

In considering the report of the CIA Steering Committee, the committee noted the following findings:

1. Due to the limited time available to carry out the CIA, certain modelling inputs and some assumptions had to be simplified, and that the results of the analysis are subject to some uncertainties
2. Due to time and modelling constraints, the consideration of the impact criteria had been done at different levels of detail, and the Steering Committee had recognized that modeling and a more in-depth analysis of the impacts on certain criteria, in particular food security, geographic remoteness of and connectivity to main markets, cargo value and type, and transport dependency could not be accommodated

In the subsequent discussions within the committee, concerns were raised about the need to have a more in-depth analysis of the potential impacts of the basket of candidate measures in terms of food security, especially in net food-importing developing countries (NFIDCs) as well as SIDS and LDCs, who are largely dependent on food imports.

The committee agreed to carry out further work on assessing the potential impacts of the policy combinations of a basket of candidate mid-term measures as assessed under the comprehensive impact assessment on food security, in particular on essential food commodities and critical agricultural input in net food-importing developing countries, as one of the factors influencing food security. This will include a literary review, liaison with other United Nations (UN) agencies and a GHG-Expert Workshop to facilitate the understanding of the possible impacts of the basket of candidate measures on food security.

Review Plan for the Short-Term GHG Reduction Measure

Way Forward to Address Challenges/Gaps in the Short-Term GHG Reduction Measure

At MEPC 80, the committee agreed on the following timeline for the review of the short-term measures:

- From MEPC 80 to MEPC 82 (Autumn 2024), the data-gathering phase
- At MEPC 82, a Working Group should be established to analyze the data continued by a Correspondence Group
- An Intersessional Working Group between MEPC 82 and MEPC 83, along with a Working Group at MEPC 83, to review the MARPOL Convention and the Guidelines.

The committee developed a way forward for the review of the short-term GHG reduction measure. During the discussion, it was unanimously agreed that the goal of the short-term GHG reduction measure is to achieve the levels of ambition of the *2023 IMO Strategy on reduction of GHG emissions from ships* and especially to reduce CO_2 emissions per transport work by at least 40 percent in 2030, compared to 2008. Regarding the general challenges and gaps, several views pointed to factors that are outside the ships' control, e.g., port waiting time, short voyages, different operational profiles within different ship types and size segments to be appropriately considered, whether the CII should consider the tank-to-wake or well-to-tank emissions in accordance with the 2024 LCA Guidelines and the lack of clarity of the current enforcement mechanism.

As a way forward and building on the general support expressed, the committee decided to conduct the review based on a gap analysis and a two-phase approach addressing some issues prior to 1 January 2026 (phase 1), whereas others may be extended after 1 January 2026 (phase 2).

To determine whether a challenge or gap should be addressed in phase 1 or phase 2, the committee agreed on the following three indicative criteria:

1. Whether the challenge or gap required detailed gap analysis
2. Whether the potential solutions could conflict with the mid-term measures under development
3. Whether the issue requires urgent attention

Following these criteria, the committee agreed on the following indicative timeframe for addressing the challenges and gaps already identified:

Phase 1	Phases 1 and 2	Phase 2
Robustness of CII as an operational energy efficiency performance indicator	Impact of idle and port-waiting time	Penalization of: • Self-unloading and geared bulk carriers • Ships navigating in adverse weather • Ships using bow thrusters • Ships equipped with inert gas generator • Ships carrying refrigerated cargo below deck • Steam-driven liquefied natural gas (LNG) carriers

		• Ro/ro cargo and ro/ro passenger ships
CII reduction factor (Z) for years 2027 to 2030	Impact of short voyages	Not accurate reflection of smaller LNG carriers in the CII reference line
	Penalization of cruise passenger ships spending time at port	Impact of CII on ballast voyages
	CII does not incentivize behavioral change, port call efficiency and just-in-time (JIT) arrival of ships	Potential overlap with the basket of mid-term measures
	Accessibility of CII ratings and IMO DCS data beyond parties to MARPOL Annex VI	CII does not address fuel emissions on their full life cycle
		CII does not allow for pooling

Terms of Reference (ToR) for Correspondence Group on the Review of the Short-Term GHG Reduction Measure

The committee instructed the Correspondence Group on the review of the short-term GHG reduction measure to:

- Further consider possible options to address the identified challenges/gaps in the short-term GHG reduction measure
- Develop draft amendments to existing instruments and/or develop new instruments as appropriate
- Submit a written report to MEPC 83 to be considered first by the Intesessional Working Group on Air Pollution and Energy Efficiency (ISWG-APEE 1).

Terms of Reference (ToR) for the Intersessional Working Group on Air Pollution and Energy Efficiency (ISWG-APEE 1)

The committee instructed the ISWG-APEE 1, scheduled prior to MEPC 83, to:

- Further consider possible options to address the identified challenges/gaps in the short-term GHG reduction measure
- Develop draft amendments to existing instruments and/or develop new instruments, as appropriate, with a view to finalization
- Submit a written report to MEPC 83

Proposals and Information Related to IMO DCS

Unified Interpretation on the Application of Amendments to Appendix IX of MARPOL Annex VI (Resolution MEPC.385(81))

The committee at MEPC 81 adopted amendments to Appendix IX of MARPOL Annex VI, introducing increased data granularity requirements, including inter alia the reporting of fuel consumption per consumer type and data on transport work. These amendments are expected to enter into force on 1 August 2025 while also inviting the parties to consider their early application from 1 January 2025.

Noting the fact that the aforementioned amendments are expected to enter into force halfway through a calendar year, which would result in two distinct levels of granularity for the data gathered in that calendar year, the committee considered a Unified Interpretation (UI) advising that:

- For ships flying the flag of the Administration that implements the amendments early (1 January 2025), to revise and verify the SEEMP prior to 1 January 2025 and to collect data with increased granularity throughout the entire year of 2025 and beyond

- For ships flying the flag of the Administration that implements the amendments on the entry-into-force date (1 August 2025), to revise and verify the SEEMP prior to 1 January 2026 and to collect data with existing level of granularity for the entire year of 2025, and with increased granularity from 1 January 2026
- For ships delivered on or after 1 August 2025 to collect data at the enhanced level of granularity from the date of delivery and onwards

During discussion, the majority of the views expressed supported the UI from a practical perspective, and in this regard, the Committee approved the circular MEPC.1/Circ.913 *Guidance on the application of the amendments to Appendix IX of MARPOL Annex VI (Resolution MEPC.385(81)).*

Draft Amendments to MARPOL Annex VI Concerning Clarifications of Entries in Data Reporting by Regulations 27 and 28 of MARPOL Annex VI

The committee considered proposed amendments to MARPOL Annex VI, concerning clarification of entries in data reporting by Regulations 27 and 28 of MARPOL Annex VI. Regulation 27 of MARPOL Annex VI on collection and reporting of ship fuel oil consumption data states that in the event of any transfer of one ship from one Administration to another, the ship shall report to the losing Administration, or any organization duly authorized by it, the aggregated data for the period of the calendar year corresponding to that Administration. Regulation 28 of MARPOL Annex VI on the operation carbon intensity states that in the event of any transfer of the ship, as addressed in regulations 27.4, 27.5 and 27.6, the ship shall calculate and report the attained annual operational CII for the full 12-month period from 1 January to 31 December in the calendar year during which the transfer took place. Therefore, as per Regulation 27 the respective data under each flag is reported to each flag State for separate reporting to the organization, whereas as per Regulation 28 the gaining flag Administration shall report the aggregated data for the whole calendar year. Based on the format of Appendix IX, this is not possible.

Following discussions, the committee approved the proposed amendments to Appendix IX of MARPOL Annex VI, introducing two new fields specifying the start and end dates for the purpose of Regulations 27 and 28. Furthermore, during the discussion, a proposal was expressed — and eventually supported — to replace the term “Oil-Fired Boiler(s)” with “Fired Boiler(s)” in order to ensure that Appendix IX reflects other equipment, such as gas-fired boilers. These draft amendments will be adopted as part of the revised MARPOL Annex VI under development.

Draft Amendments to the 2022 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP)

The committee considered a proposal containing the necessary amendments in Appendix 3 of the SEEMP Guidelines to align with the amendments to Appendix IX of MARPOL Annex VI adopted in the previous session. During the discussion, all views expressed support for the proposal, highlighting also the necessity for consequential changes related to the term “Oil-Fired Boiler(s)” (to “Fired Boiler(s)”).In this regard, the committee adopted resolution MEPC.395(82) – *2024 Guidelines for the development of a ship energy efficiency management plan (SEEMP)* providing consequential updates to the standardized data-reporting format for the data collection system and operational carbon intensity (Appendix 3 of the SEEMP) guidelines seeking alignment with the amendments to appendix IX of MARPOL Annex VI.

Proposed Changes to the Collection of Fuel Consumption Data to Exclude Oil Residue/Sludge and Water Content in Fuel Oils

The committee considered a proposal pointing out the inaccuracy in the fuel oil consumption calculation using the bunker delivery note (BDN) method, which unavoidably includes the water content and suggests subtracting the water content from the fuel oil consumption to be verified using the analysis results of the representative sample of the fuel oil (MARPOL delivered sample under MARPOL Annex VI).

Similar to the aforementioned proposal, the committee also considered a submission analyzing the quantity of oil residue/sludge being collected from ships using residual fuels, highlighting that for the fuel oil measurements methods using bunker delivery notes and bunker fuel oil tank monitoring on board the residue/sludge will be part of ship fuel oil consumption data. Consequently, the submission proposed that the residue/sludge should be deducted from the fuel oil consumption of a certain period, justified from the records of the Oil Record Book Part I and the corresponding receipts or certificates to reception facilities and that in any case, the maximum quantity of residue/sludge to be subtracted to not exceed 1 percent of the fuel oil consumed.

During the discussion, due to the divergent views expressed, the two proposals did not move forward.

Sample Format for the Confirmation of Compliance (MEPC.1/Circ.876)

The committee considered a submission proposing amendments to the sample format for the Confirmation of Compliance – SEEMP Part II to update the references to regulation 26.2 of MARPOL Annex VI and the 2022 SEEMP Guidelines. Following consideration, the committee approved the revised circular MEPC.1/Circ.914 *Sample format for the confirmation of compliance pursuant to regulation 5.4.5 of MARPOL Annex VI,* providing the necessary changes in MEPC.1/Circ.876 – to refer to the 2022 SEEMP Guidelines – and to the sample format for the confirmation of compliance pursuant to regulation 5.4.5 of MARPOL Annex VI and requested the secretariat to issue an MEPC Circular on the matter and revoke MEPC.1/Circ.876.

Information on the Availability of Biofuels at Ports

The committee considered a proposal suggesting the inclusion of information on the availability of bio marine fuels at ports in GISIS. During discussion, several delegations supported the need to provide accurate and up-to-date information on the availability of biofuels, highlighting that the MARPOL Annex VI GISIS module is an important source of information for the industry and Administrations. In addition, the committee noted that further information related to the uptake of alternative fuels was available on the website of the IMO Future Fuels and Technology (FFT) Project. Following discussions, the committee requested the secretariat to amend the “regulation 18.1 tab” in the “MARPOL Annex VI” GISIS module to include information on the availability of biofuels at ports.

Certification of Existing Engine Subject to Substantial Modification

Draft Amendments to the NO_x Technical Code 2008 (NTC 2008)

PPR 11 finalized the draft amendments to MARPOL Annex VI and the NTC 2008 on the use of multiple engine operational profiles for a marine diesel engine and submitted them to MEPC 82 for consideration and approval. The committee approved the draft amendments to MARPOL Annex VI, which will be included as part of the revised MARPOL Annex VI, and the associated draft amendments to the NO_x Technical Code 2008 with a view to adoption at MEPC 83 but with the same entry-into-force date as that of the revised MARPOL Annex VI.

The committee also considered proposed changes to the draft amendments to the NTC 2008, providing guidance with respect to the certification of an existing engine subject to substantial modification. The draft section 7.2 of the NTC Code accounts to the extent possible for the real-world issues associated with the testing of an installed engine. However, several challenges remain relating to the testing of an engine on board a ship, as opposed to at a test bed:

- Onboard Parent Engine test requires significant pre-planning attention to identify any potential problems that can be encountered
- Engine load management is under the control of the applicant that must also take into account matters related to the safety of the ship, such as ship loading and sea area
- Challenges as to accurately assess the net fuel consumption due to the increased complexity

Noting the above challenges, the committee agreed on the proposed changes to the draft amendments to the NTC 2008 related to the certification of an engine subject to substantial modification or to a tier to which an installed

engine is not certified, as well as to the proposed flowchart illustrating the certification process for an engine subject to substantial modification. The draft amendments will be submitted for adoption at MEPC 83.

MEPC Circular on the Proposed Guidance on the Content of the Engine Emission Test Plan

In addition, the committee had under consideration and agreed on a proposed guidance on the content of the Engine Emission test plan in conjunction with the draft amendments to the NTC 2008, providing the main points that should be addressed prior to the onboard Parent Engine test. This guidance will be issued as an MEPC circular once the draft amendments to the NTC 2008 are adopted.

Re-Establishment of the GESAMP Task Team on Exhaust Gas Cleaning System (EGCS)

The committee considered draft terms of reference for the re-establishment of the GESAMP Task Team on EGCS. During discussion, several views supported amending the proposed terms of reference to include the determination of emission factors in addition to the methodology, to consider any other relevant chemical substances in EGCS discharge water in addition to the proposed list of priority hazardous substances, removing the reference to the use of 50 percent of laboratory detection limits as assigned values for non-detects, and align key terminology and evaluation criteria with the *2022 Guidelines for risk and impact assessments of the discharge water from EGCS* to guarantee the reliable and thorough implementation of the applicable environmental risk assessment process.

Due to time limitations, the committee referred the draft terms of reference for the re-establishment of the GESAMP Task Team on EGCS to the Sub-Committee on Pollution Prevention and Response (PPR) 12 for further consideration with a view to finalization.

EEXI and Engine/Shaft Power Limitation System

The committee considered a submission highlighting the administrative workload and operational cost related to reporting obligations of the Shaft Power Limitation (SHaPoLi)/Engine Power Limitation (EPL) system, proposing amendments to the *2021 Guidelines on the shaft/engine power limitation system to comply with the EEXI requirements and use of a power reserve*. The proposal suggests in case of having used a power reserve, instead of notifying without delay the Administration or recognized organization (RO) responsible for issuing the relevant certificate and the competent authority of the relevant port of destination, to record the use of power limit exceedance in the Onboard Management Manual (OMM) and report the instances of power limit exceedance to the Administration on an annual basis. During discussion, due to the divergent views expressed, the proposal did not move forward.

The committee also considered a similar submission stressing the increased administrative burden and operational costs related to the verification survey(s) required after each reactivation or replacement of the ShaPoLi/EPL system, advising that in the cases that the power reserve was activated pre-emptively but not used, the verification of reactivation or replacement of the SHaPoLi/EPL by the Administration or RO to not be required. Instead, the reactivation or replacement of the SHaPoLi/EPL system should be recorded in the OMM and the relevant supporting documents should be included in the records and made available on demand to the Administration or the RO at the next scheduled survey for verification. Again, due to the divergent views expressed, the proposal did not move forward.

Reduction of the Impact on the Arctic of Emissions of Black Carbon (BC) from International Shipping

PPR 11 finalized the draft guidance on the best practice on recommendatory goal-based control measures to reduce the impact on the Arctic of BC emissions from international shipping and submitted it to MEPC 82 for consideration and adoption. In this regard, the committee adopted Resolution MEPC.393(82) – *Guidance on best practice on recommendatory goal-based control measures to reduce the impact on the arctic of black carbon*

emissions from international shipping, which is intended to assist ship operators/companies in their efforts to reduce BC emissions from their ships operating in or near the Arctic in measurable and concrete ways.

The committee also adopted Resolution MEPC.394(82) – *Guidelines on recommendatory black carbon emission measurement, monitoring and reporting*, as prepared and submitted by PPR 11, providing recommendations for the measurement, monitoring and reporting of BC emissions data from marine diesel engines or exhaust gas treatment systems.

BALLAST WATER MANAGEMENT AND MARINE BIOSAFETY

Review of the Ballast Water Management Convention

The Working Group considered a number of topics related to the review of the BWM Convention that would benefit from in-person discussion to advance their resolution, with a view to informing and facilitating the further work of the Correspondence Group on Review of the BWM Convention. The topics were discussed as follows:

1. **Exceptional discharges on the high seas or in any other designated areas**: Amendments to regulation A-3 addressing circumstances under which the discharge of unmanaged or partially managed ballast water and sediments may be allowed on the high seas or in any other designated areas, indicating the particular reasons for conducting BWE+T other than operation in challenging water conditions and contingency measures.
2. **BWMS maintenance procedures**: The objectives were to specifically introduce requirements for the inclusion of BWMS maintenance procedures in the ship's Ballast Water Management Plan (BWMP) and Ballast Water Record Book (BWRB), while avoiding duplication with existing ship systems and procedures, such as the Planned Maintenance System (PMS) under the ISM Code. A simple amendment to regulation B-2 was agreed to introduce the inclusion of basic information in the BWRB and refer to the Operation, Maintenance, and Safety Manual (OMSM) for details as an equivalent recording system.
3. **Standardization of BWMS data logs and export files**: Identification of the scope of the standardization of data logs and export files of BWMS, e.g., table of standardized data requirements, and/or a set of standard or acceptable formats, to facilitate the work of the Correspondence Group in developing such standards.
4. **BWMS testing parameters and test conditions**: Identification of aspects for the development of testing parameters and conditions, such as the basis for setting test conditions and how they relate to the treatment rated capacity (TRC), how TRC should be defined and demonstrated, etc.
5. **Consideration and reporting of disinfection by-products**: Consideration and reporting on the issue of disinfection by-products (DBPs) in discharges from BWMS that make use of active substances, including the potential establishment of maximum allowable discharge concentration(s) (MADC(s)) for DBPs as well as sampling and analysis of DBPs during surveys. The Working Group recognized the complexity of this matter and agreed that it would not be further considered by the Correspondence Group at this time.
6. **Type of analysis during surveys**: Amendments to regulation E-1 introduced sampling and analysis of ballast water discharges during flag State surveys twice every five years, allowing for both indicative and detailed analysis. It was agreed that, as the amendments did not specify the type of analysis in any case, the detailed analysis should be considered only as a voluntary option during surveys.

The committee noted the targeted discussions and instructed the Correspondence Group on Review of the BWM Convention to take related outcomes into account in its further work.

Modifications to Ballast Water Management Systems with Existing Type Approval

The committee approved circular BWM.2/Circ.43/Rev.2 *2024 Guidance for Administrations on the type approval process for ballast water management systems.*

The Working Group confirmed that the guidelines should be developed separately to the convention review, and that it should relate only to BWMS type approvals and not individual shipboard installations, with the latter point being a survey and certification matter.

While the topic of modifications to ballast water management systems with existing type approval would ultimately be addressed under the convention review stage, the Ballast Water Review Group recognized that the BWMS Code has limited guidance regarding approval of modifications to a BWMS after type approval has been granted, and agreed that it should be addressed in the interim with guidance to facilitate a consistent process for approval of modifications to BWMS by different Administrations.

The most substantial part of this work consists of the introduction of an appendix containing tables with examples relating to major and minor components, containing three tables covering, respectively, examples of major components, changes or modifications affecting major components, and minor components.

Revision of Guidance on Ballast Water Record-Keeping and Reporting

The committee approved circular BWM.2/Circ.80/Rev.1 *2024 Guidance on ballast water record-keeping and reporting*, providing additional scenarios 3 and 4 in Appendix 1 of the guidance.

When MEPC 80 approved BWM.2/Circ.80, it had not been possible to incorporate scenarios related to challenging water quality (CWQ) conditions because relevant guidance was still in development, and it had been recognized that this should be considered after the finalization of any guidance on operations in CWQ conditions. Following the adoption at MEPC 81 of the *Interim guidance on the application of the BWM Convention to ships operating in challenging water quality conditions* (resolution MEPC.387(81)), it was possible to introduce the CWQ-related scenarios into the BWRB.

Ballast Water Management System Approvals

Final approval was granted by the committee for HiBallast 2.0 ballast water management system, submitted by the Republic of Korea. The HiBallast 2.0 BWMS makes use of a sodium hypochlorite solution as an active substance. The treatment process consists of a maximum allowable dosage of the sodium hypochlorite solution active substance is 9.9 mg/L TRO as Cl_2, and neutralization of the TRO by using sodium thiosulfate as the neutralizing agent before discharging to overboard during ballast water discharge.

DESIGNATION OF SPECIAL AREAS, EMISSIONS CONTROL AREAS (ECA) AND PARTICULARLY SENSITIVE SEA AREAS (PSSA)

Adoption of the Canadian Arctic and Norwegian Sea ECAs for Nitrogen Oxides (NO_X), Sulfur Oxides (SO_X), and Particulate Matter (PM)

The committee adopted Resolution MEPC.392(82) – *Amendments to MARPOL Annex VI (Designation of the Canadian Arctic and the Norwegian Sea as emission control areas for nitrogen oxides, sulfur oxides and particulate matter, as appropriate)*. The designation of the ECAs is deemed necessary to protect public health and ecologically sensitive Arctic ecosystems by reducing harmful air pollution and emissions. These new ECAs also aim to address long-standing concerns of BC emissions in the arctic region.

Canadian Arctic ECA

Sulfur Oxides (SO_X) and PM:
The Canadian Arctic ECA will impose a fuel oil sulphur content limit of 0.10 percent by mass.

Nitrogen Oxides (NO_X):
The Canadian Arctic ECA will apply to ships constructed (keel laying date) on or after 1 January 2025 and will be operating in the Canadian Arctic ECA.

Figure 1. Canadian Arctic ECA [Source: MEPC 80/16/2]

Norwegian Sea ECA

Sulfur Oxides (SO_X) and PM:
The Norwegian Sea ECA will impose a fuel oil sulfur content limit of 0.10 percent by mass.

Nitrogen Oxides (NO_X):
The Norwegian Sea ECA will apply to ships constructed on or after 1 March 2026 and operating in the Norwegian Sea Emission Control Area. Ships constructed on or after 1 March 2026 will mean a ship:

1. For which the building contract is placed on or after 1 March 2026
2. In the absence of a building contract, the keel of which is laid, or which is at a similar stage of construction on or after 1 September 2026
3. The delivery of which is on or after 1 March 2030

To accommodate the "three dates criteria" used as the application dates for the Norwegian Emission Control Area, the committee requested the III Sub-Committee to consider if there was a need to highlight that the three-date criterion would only apply to the Norwegian ECA when updating the HSSC Guidelines.

Figure 2. Norwegian Sea ECA [Source: MEPC 81/11/1]

The entry into force date of the Canadian Arctic and Norwegian Sea ECAs in accordance with the MARPOL Convention will be 1 March 2026.

Proposal for the Designation of the Nusa Penida Islands and Gili Matra Islands in Lombok Strait as a Particularly Sensitive Sea Area (PSSA)

MEPC 82 considered a proposal by Indonesia to designate two areas, which are Nusa Penida and Gili Matra in Lombok Strait, as a Particularly Sensitive Sea Area. The proposal advocates for the conservation of the region's vibrant ecological richness and recognizes the area's dual significance as a haven for rich biodiversity and a cornerstone of local economic and cultural identity. Given the strait's vital role in international trade and increasing vessel traffic, the proposal includes the newly established routing systems (traffic separation scheme) as the Associated Protective Measures.

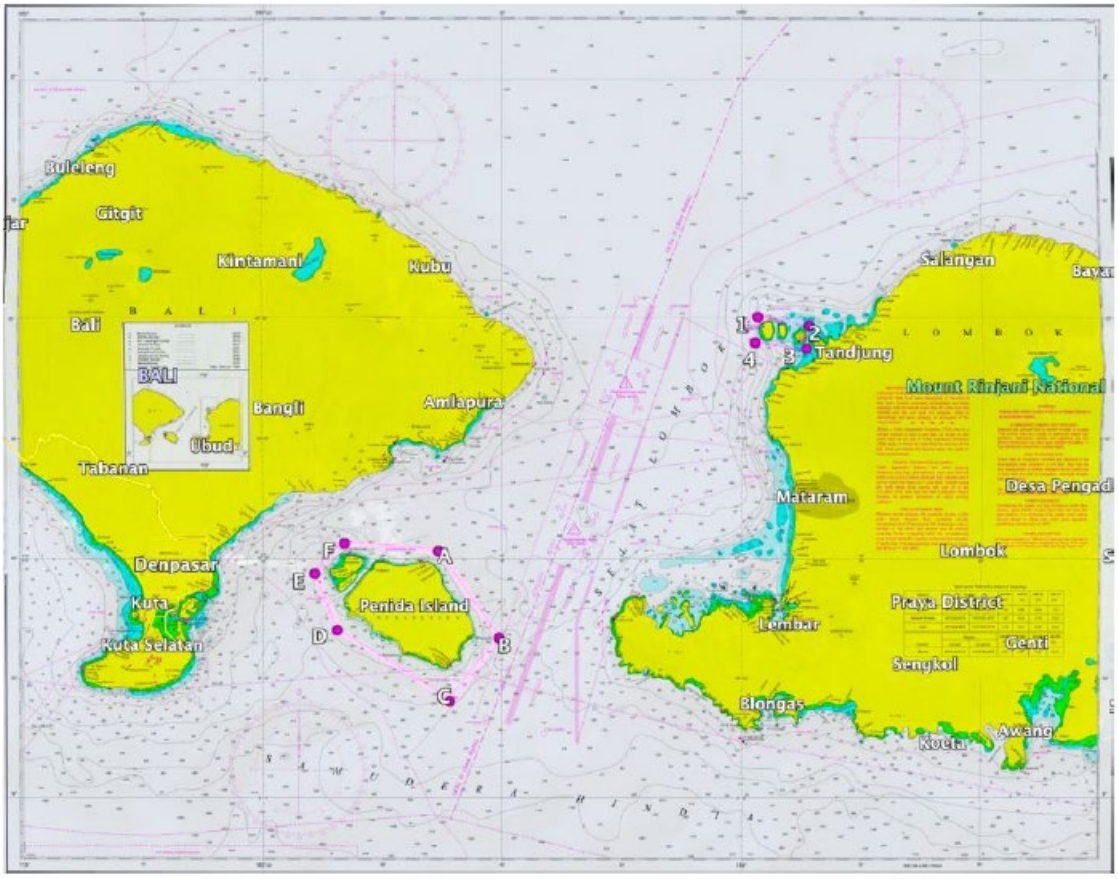

Figure 3. Proposed Nusi Penida and Gili Matra in Lombok Straits PSSA [Source: MEPC 82/12]

The committee adopted resolution MEPC.396(82) - *Designating the Nusa Penida islands and Gili Matra islands in Lombok strait as a Particularly Sensitive Sea Area.*

OTHER DEVELOPMENTS

Guidelines on Good Practice Relating to Clean-Up of Plastic Pellets from Ship-Source Releases

The committee approved the *Guidelines on good practice relating to clean-up of plastic pellets from ship-source releases* and requested the secretariat to prepare their final text for publication through the IMO Publishing Service.

The guidelines are a reference document providing practical guidance to IMO member States and other entities when responding to ship-source releases of plastic pellets and highlight how the response to spills of plastic pellets might differ from more established oil spill response. The document provides broad guidance on the development of large-scale strategies relevant to National Contingency Plans (NCPs), and practical guidance relevant to developing smaller-scale site specific response plans (e.g., supplementing local contingency plans (LCPs)), enabling readers to produce addenda to existing response plans.

Reduction of Underwater Noise from Commercial Shipping

The committee approved the amendments to the *Revised Guidelines for the Reduction of Underwater Noise from Shipping to Address Adverse Impacts on Marine Life* (MEPC.1/Circ.906/Rev.1), adding the URN planning reference chart as a new Appendix 4 in section 5. This chart is part of the URN Management Planning and aims to raise awareness and visualize the URN management planning process. Furthermore, the committee agreed to a three-year Experience Building Phase (EBP) for the revised guidelines and invited member States and international organizations to submit to the committee information, observations, comments and recommendations based on the practical experience gained with the application of the revised guidelines.

The committee further approved the draft Action Plan with the extended target date of 2026, which is considered a dynamic document to be reviewed and revised as necessary.

The objective of the Action Plan to further prevent and reduce URN from ships is to guide the IMO's continued work on this issue and to provide a mechanism to identify specific outcomes and indicative actions in a meaningful and measurable way. The action items in this plan may be pursued in parallel with the EBP.

Finally, the committee encouraged interested member States and international organizations to take into account the outcome of the workshop on the "Relationship between energy efficiency and underwater radiated noise from ships" (SDC 10/INF.3) when considering the relationship between energy efficiency measures and URN.

Guidelines on Mitigation Measures to Reduce Risks of Use and Carriage for Use of Heavy Fuel Oil (HFO) as Fuel by Ships in Arctic waters

The committee approved Circular MEPC.1/Circ.915 *Guidelines on mitigation measures to reduce risks of use and carriage for use of heavy fuel oil as fuel by ships in Arctic waters.*

The purpose of the guidelines is to provide ship operators of ships planning voyages in the Arctic with recommendations on measures to reduce the risk of spills while using or carrying HFO for use as fuel in Arctic waters, and to assist Administrations of the parties to MARPOL, the coastlines of which border on Arctic waters, to implement measures at national levels to reduce the risk of the use and carriage for use of HFO as fuel on ships in Arctic waters. The section applicable to the ship operators provide guidance on navigational measures, ship operations, HFO bunkering, communication, HFO spill preparedness, early detection and response, familiarization, training and drills.

Revised Guidance on Best Management Practices for Removal of Anti-Fouling Coatings from Ships

The committee approved circular AFS.3/Circ.6 on *2024 guidance on best management practices for removal of anti-fouling coatings from ships.*

The revised guidance has been updated following the amendments to the AFS Convention to introduce controls on cybutryne, which entered into force on 1 January 2023. The guidance replaces the 2014 *Guidance on best management practices for removal of anti-fouling coatings from ships, including TBT hull paints*, and provides information to the facilities where AFS coatings are removed on methods of AFS removal techniques, and environmentally protective steps for AFS removal waste.

Revised Tank Cleaning Additives Guidance Note and Reporting Form

PPR 11 finalized the draft *Revised Tank Cleaning Additives Guidance note and Reporting Form* and submitted the draft guidance to MEPC 82 for consideration and approval. In this regard, the committee approved MEPC.1/Circ.590/Rev.1 on *Revised tank cleaning additives guidance note and reporting form*, providing concise information to manufacturers of cargo tank cleaning additives to assist them when submitting their products for assessment as cargo tank cleaning additives under MARPOL Annex II.

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