
IMO Update – Environmental Issues

Summary

Recent Developments:

Marine Environment Protection Committee (MEPC 78)

MEPC 78 met in June 2022. Considering the GHG reduction agenda, the Committee considered the outcome of the correspondence group on carbon intensity reduction and two intersessional working groups on GHG (ISWG-GHG 11 & 12). Discussions on revising the IMO GHG strategy, fuel lifecycle assessment, and mid to long-term measures continued. Amendments to MARPOL Annex VI, Appendix IX, on DSC were approved, and numerous CII and EEXI guidelines were also approved.

Ongoing and New Items:

Work on **GHG measures** will continue through a correspondence group and intersessional meetings before MEPC 79 in December 2022.

In More Detail

1. Recent Developments:

1.1 Marine Environment Protection Committee (MEPC 78, June 2022)

Revised GHG Strategy

The Committee had a lengthy high-level discussion on the revision of the IMO GHG strategy. Many views on the level of ambition were expressed, including “zero by 2050”, with some environmental NGOs suggesting an earlier target of 2040. Most views centred around zero (or net zero) by 2050, more stringent targets for 2030, an additional milestone in 2040, and the suggestion of five-yearly check points.

Although positions were being laid down, the aim of this meeting was to define a way forward for the review of the IMO GHG strategy. It was decided to continue this work at the next intersessional working group (ISWG-GHG 13) in December 2022.

ISWG-GHG 11 Report

The eleventh intersessional working group on GHG reduction met in March with its principal tasks being the development of draft lifecycle GHG and carbon intensity guidelines for maritime fuels (draft LCA guidelines) and the revision of the ship fuel oil consumption Data Collection System (DCS). A review of the impact assessment procedures was also conducted.

The Committee noted the discussion on LCA guidelines and agreed to establish a correspondence group (CG) on marine fuel lifecycle GHG analysis to take the work forward. Recognising the complexity of the task, the deadline for reporting was moved to MEPC 80 (July 2023) with an interim report to be submitted to MEPC 79 (December 2022).

In addition, the Committee noted the information provided in document MEPC 78/7/13 (Republic of Korea). It covered the measurement of actual methane slip emissions from LNG dual fuel engines in terms of Tank-to-Wake (TtW) emission factors by using the relevant procedures specified in the NOx Technical Code 2008. The Committee referred the paper to the CG.

The Committee noted the discussion on the revision of the ship fuel oil consumption DCS and approved the draft amendments to Appendix IX of MARPOL Annex VI to include more information on the ship's carbon intensity performance in the DCS, including:

- Attained EEXI
- applicable CII (AER/cgDIST)
- required CII
- attained CII before any correction
- attained CII
- operational carbon intensity rating (A, B, C, D, or E).

ISWG-GHG 12 Report

The twelfth intersessional working group on GHG reduction met in May with its principal tasks being the consideration of issues arising from the final report of the Correspondence Group on Carbon Intensity Reduction and consideration of concrete proposals for mid- and long-term measures. How to manage the workload generated from GHG issues was also discussed.

In considering the CG report, the ISWG had agreed many of the guidelines necessary for the implementation of the CII. CII corrections was an area of considerable debate and many, including those proposed for gas carriers, were rejected with the main reason cited being a lack of data. However, the Committee invited interested parties to collect relevant data in the early years of implementation of the CII rating system and to report relevant information to the Committee ahead of the review of the CII regulations and guidelines, to be completed before 1 January 2026.

In considering the SEEMP guidelines, the ISWG-GHG 12 had included additional text specifically relating to LNG carriers concerning speed optimisation (paragraph 5.2.6 of the guidelines). Additional text was also added in paragraphs 7.1.4 and 7.1.5, on using the Custody Transfer Monitoring System (CTMS) when calculating consumption, including discounting the nitrogen mass content.

The ISWG had considered amendments to the EEXI guidelines to incorporate an in-service measurement method to determine the reference speed. This was agreed and the EEXI guidelines have been updated. It is worth noting that IACS submitted their draft guidelines on the implementation of EEXI (as INF.27) and a paper (INF.16) on the development of guidelines for the use of computational fluid dynamics (CFD) for the purposes of deriving the reference speed (V_{ref}). As information papers they were not discussed and simply noted in the report of the Committee.

When considering PSC guidelines, the ISWG had debated whether it should be regarded as a detainable deficiency if the implementation plan and/or the plan of corrective actions for a ship rated as D for three consecutive years or rated as E are not implemented by the ship as planned at the time of an inspection. The Committee agreed that this matter should be referred to III 8 for further consideration and to identify whether any further guidance needs to be developed on this issue and to advise MEPC 79 accordingly.

The Committee noted the discussions on proposals for mid-term measures and associated impact assessments in the context of Phase I of the Work Plan as well as the proposal to establish an International Maritime Research Board. It also noted that the Group agreed to advance to the further development of a “basket of candidate mid-term measures” under Phase II.

The Committee adopted the following guidelines:

SEEMP

Res. MEPC.346(78) - 2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)

Res. MEPC.347(78) - Guidelines for the verification and company audits by the Administration of Part III of the Ship Energy Efficiency Management Plan (SEEMP)

DCS

Res. MEPC.348(78) - 2022 Guidelines for Administration verification of ship fuel oil consumption data and operational carbon intensity

Res. MEPC.349(78) - 2022 Guidelines for the development and management of the IMO Ship Fuel Oil Consumption Database

EEXI

Res. MEPC.350(78) - 2022 Guidelines on the method of calculation of the attained Energy Efficiency Existing Ship Index (EEXI)

Res. MEPC.351(78) - 2022 Guidelines on survey and certification of the attained Energy Efficiency Existing Ship Index (EEXI)

CII

Res. MEPC.352(78) - 2022 Guidelines on Operational Carbon Intensity Indicators and the Calculation Methods (CII Guidelines, G1)

Res. MEPC.353(78) - 2022 Guidelines on the Reference Lines for use with Operation Carbon Intensity Indicators (CII Reference Lines Guidelines, G2)

Res. MEPC.354(78) - 2022 Guidelines on the Operational Carbon Intensity Rating of Ships (CII Rating Guidelines, G4)

Res. MEPC.355(78) - 2022 Interim Guidelines on Correction Factors and Voyage Adjustments for CII Calculations (CII Guidelines, G5)

1.2 Sub-Committee on Implementation of IMO (III 8)

III 8 met in July and discussed the issue of PSC and the CII, as discussed above. Following extensive consideration, the Sub-Committee agreed that at this stage there was no support within the Sub-Committee to regard as a detainable deficiency the absence of implementation by the ship as planned at the time of the inspection of the three-year implementation plan and/or the plan of corrective actions for a ship rated as D for three consecutive years, or rated as E, and agreed to advise MEPC 79 accordingly.

2. Ongoing and New Items:

2.1 Marine Environment Protection Committee - Reduction of Greenhouse Gas

Work will now focus on the revision of the IMO strategy (with a view to completion by MEPC 80 in July 2023) and the mid-term measures, as a basket of measures in the context of Phase II of the work plan. These topics will be next discussed at the intersessional meeting (ISWG-GHG 13), scheduled to meet just before MEPC 79 in December 2022 and be progressed at MEPC 79.

In addition, the Committee has agreed to a correspondence group on the LCA Guidelines which will report to MEPC 80 in July 2023. It is anticipated there will be two further intersessional working groups between MEPC 79 and 80.