



IMO Marine Environment Protection Committee Updates

80th Session (MEPC 80)

Committee Overview

The Marine Environment Protection Committee (MEPC) stands at the forefront of marine environment conservation. Its scope includes the crucial task of mitigating ship-generated pollution, primarily governed by the global MARPOL treaty. This pivotal treaty ensures the prevention of accidental or operational pollution emanating from ships.



MEPC 80 Highlights (3-7 July 2023)

This session delved into numerous marine environmental topics:

- Ballast water management
- Energy-efficient shipping practices
- Strategies for greenhouse gas reduction
- Tackling air pollution
- Measures against underwater noise
- Proactive pollution response
- Focusing on Special Areas, ECAs, and PSSA

Prevention of Air Pollution: Biofuels in Focus



According to MEPC 80, leveraging biofuels and their mixtures has emerged as a strategic response to air pollution challenges. The Interim Guidance encapsulated within regulations 26 to 28 of MARPOL Annex VI (relevant to IMO's Data Collection System & Carbon Intensity Indicator), has been sanctioned. This guidance is slated for activation on October 1st, 2023. Key highlights of the guidance are:

- Biofuels must be certified by an international certification scheme.
- The GHG reductions, spanning the entire production & consumption cycle, must surpass 65%, especially compared to the comprehensive emission of fossil MGO at 94 gCO₂e/MJ.
- The conversion factor (Cf) draws its value from the overall GHG emissions of the fuel, aligned with its certification, adjusted by its Lower Calorific Value (LCV). This factor holds a minimum limit of 0.
- For blends, the Cf's determination leans on a weighted average, rooted in the energy contribution of the individual fuels involved.

This approach remains an interim solution, pending the rollout of an all-encompassing greenhouse gas (GHG) emissions strategy steered by the IMO Life Cycle Assessment (LCA) Guidelines.

Energy Efficiency in Shipping: IMO DCS Reporting Changes

With an ever-growing emphasis on the energy efficiency of vessels, MEPC 80 initiated discussions on refining Appendix IX of MARPOL Annex VI. The focal point was the IMO's Fuel Oil Consumption Data Collection System.



Key amendments proposed:

- Integrating additional cargo-specific data to calculate transport work. Metrics include tonne-mile, TEU-Mile, and/or passenger-mile.
- Recognizing TEU-miles as a new standard for container ship cargo measurements.
- Approving the draft changes to the Fuel Oil Consumption Data Collection System. The revised information in Appendix IX is up for validation at MEPC 81.

It encompasses:

- Comprehensive Total transport work details.
- Voluntary reporting of laden distance traveled (in nautical miles).
- Documenting onshore power supply amounts (KWh).
- If applicable, the inclusion of innovative technology.
- Detailed fuel consumption, differentiated by the ship's operational states (underway, berthing, etc.).

Furthermore, MEPC 80 proposed enhanced accessibility of collected data under Regulation 27. With strict confidentiality measures, selected consultants can access the data. Moreover, shipping companies can now opt to disclose their DCS data publicly. Pending approval at MEPC 81, these amendments might come into force by 2025, necessitating updates to SEEMP, DCS verification, and database guidelines.

Short-term GHG Reduction Measures: Updates on CII Calculation

Several proposals surfaced during the MEPC 79 & 80 sessions, targeting amendments to the 2022 Interim Guidelines on correction factors and voyage adjustments for Carbon Intensity Indicator (CII) calculations.

These guidelines, referenced as MEPC 355(78), sought to integrate correction factors for:

- Refrigerated cargo carriers.
- Adjustments for short voyages and port waiting times.
- Tanker STS operations undergoing multiple or partial discharges during a voyage for a single cargo load.
- Fuel consumption specifics for boilers.
- The use of inert gas generators during cargo operations.
- Operations of self-unloading bulk carriers.



The MEPC 80 discussions further expanded with these additional submissions linked to CII:

- **Regulation 19.3 Amendment:**
A clarification proposal for regulation 26.3, ensuring it doesn't pertain to 'category A ships' as categorized in the Polar Code.
- **Confirmation of Compliance Format Tweaks:**
Recommendations to revise the Confirmation of Compliance sample format (MEPC 1/Circ.876) to synchronize with updated MARPOL Annex VI regulations and pertinent guidelines.
- **CII Metric Tailored for Cruise Ships:**
A pitch to formulate a CII metric specifically for cruise passenger vessels.
- **Concerns for Steam-Driven LNG Carriers:**
A highlight of the challenges in applying the CII & Energy Efficiency Existing Ship Index (EEXI) to steam-driven LNG vessels. There's also a suggestion for a shift in the CII rating system, favouring fleet-wide compliance over individual ship evaluations.

Based on these suggestions, it's been articulated that the CII framework should remain untouched for now. However, tweaks to correction factors could potentially be rolled out by 2025.

The structured CII review is slated to span two primary stages:

1. Data collation, wrapping up by Autumn 2024 (MEPC 82).
2. Data analysis and probable CII refinements, concluding by Summer 2025 (MEPC 83).
3. A full review of the Convention & Guidelines is anticipated by Spring 2025.

To sum up, these proposals are not just table talk. They've been duly noted and are set to influence the assessment of short-term measures, with the review process expected to culminate by January 1st, 2026.

Bunker Delivery Note (BDN) Clarifications

The document MEPC 1/Circ.795/Rev.8, named "Unified Interpretations to MARPOL Annex VI – Regulations 18.5 and 18.6", sheds light on the physical or digital Bunker Delivery Note (BDN) format. This Unified Interpretation underscores that BDNs must comply with the parameters in MARPOL Annex VI, irrespective of their format.

This adaptation seeks to marry flexibility with strict regulatory adherence.



Fuel Definitions Refined

"Fuel oil", "gas fuels", and "low-flashpoint fuels" underwent detailed scrutiny. Post the decisions made during MEPC 79, the BDN incorporated specific details on fuel flashpoints, leading to inquiries on its relevance to "gas fuels" & "low-flashpoint fuels".



Given this backdrop, the committee greenlit specific modifications to the MARPOL Annex VI norms, awaiting ratification at MEPC 81:

- Regulation 2 (Definitions):

The term "fuel oil" was honed to articulate, "Fuel oil signifies any fuel procured for and purposed for maritime usage". Concurrently, a fresh definition aligning with the IGF Code was introduced: "Gas fuel is characterized as a fuel oil with a vapor pressure that overshoots 0.28 MPa absolute at a temperature setting of 37.8°C".

- Regulation 18 Insights:

- A novel Subsection 5.2 is ushered into this regulation, broadening the BDN prerequisites to encompass gas and low-flashpoint fuels.
- BDNs tailored for these fuels should encapsulate specific metrics, notably those enumerated from items 1 through 6 of Appendix V of MARPOL Annex VI. Moreover, they should integrate the fuel's density as ascertained by an apt testing procedure for that fuel category, flanked by its pertinent temperature metric. To add, the BDN must feature a duly authenticated affirmation verifying the fuel's alignment with the quality benchmarks delineated in Regulation 18's third paragraph.
- Notably, despite the usually minuscule sulfur levels in low-flashpoint and gas fuels, the BDN mandate persists in recording sulfur content, fortifying transparency even when such content is marginal.

List of resolutions adopted by MEPC 80

RESOLUTION MEPC 369(80) – AMENDMENTS TO APPENDIX II OF THE BWM CONVENTION CONCERNING THE FORM OF THE BALLAST WATER RECORD BOOK

MANAGEMENT AND DEVELOPMENT OF BALLAST WATER MANAGEMENT PLANS (G4)

RESOLUTION MEPC 371(80) – AMENDMENTS TO THE GUIDELINES FOR BALLAST WATER EXCHANGE (G6)

RESOLUTION MEPC 372(80) – GUIDELINES FOR THE USE OF ELECTRONIC RECORD BOOKS UNDER THE BALLAST WATER MANAGEMENT CONVENTION

RESOLUTION MEPC 373(80) – 2023 GUIDELINES FOR THERMAL WASTE TREATMENT DEVICES (TWTD)

RESOLUTION MEPC 374(80) – AMENDMENTS TO THE 2022 GUIDELINES ON SURVEY & CERTIFICATION OF THE ENERGY EFFICIENCY DESIGN INDEX (EEDI) (RESOLUTION MEPC 365(79))

RESOLUTION MEPC 375(80) – AMENDMENTS TO THE 2021 GUIDELINES ON THE SHAFT/ENGINE POWER LIMITATION SYSTEM TO COMPLY WITH THE EEXI REQUIREMENTS & USE OF A POWER RESERVE

RESOLUTION MEPC 376(80) GUIDELINES ON LIFE CYCLE GHG INTENSITY OF MARINE FUELS

RESOLUTION MEPC 377(80) – 2023 IMO STRATEGY FOR REDUCTION OF GHG EMISSIONS FROM SHIPS

RESOLUTION MEPC 378(80) – 2023 GUIDELINES FOR THE CONTROL & MANAGEMENT OF SHIPS' BIOFOULING TO MINIMIZE THE TRANSFER OF INVASIVE AQUATIC SPECIES

RESOLUTION MEPC 379(80) – 2023 GUIDELINES FOR THE DEVELOPMENT OF THE INVENTORY OF HAZARDOUS MATERIALS

RESOLUTION MEPC 380(80) – DESIGNATION OF THE NORTHWESTERN MEDITERRANEAN SEA AS A PSSA

RESOLUTION MEPC 381(80) – ESTABLISHMENT OF THE DATE ON WHICH THE DISCHARGE REQUIREMENTS OF REGULATIONS 15.3, 15.5 AND 34.3 TO 34.5 OF MARPOL ANNEX I IN RESPECT TO THE RED SEA & THE GULF OF ADEN SPECIAL AREAS, SHALL TAKE EFFECT

RESOLUTION MEPC 382(80) ON THE ESTABLISHMENT OF THE DATE ON WHICH THE DISCHARGE REQUIREMENTS OF REGULATION 6 OF MARPOL ANNEX V, IN RESPECT TO THE RED SEA SPECIAL AREA, SHALL TAKE EFFECT



List of circulars approved by MEPC 80

BWM.2/Circ.66/Rev.5	INTERIM GUIDANCE ON THE USE OF BIOFUELS UNDER REGULATIONS 26, 27, 28 OF MARPOL ANNEX VI (DCS AND CII)
BWM.2/Circ.78	PROTOCOL FOR VERIFICATION OF BALLAST WATER COMPLIANCE MONITORING DEVICES
BWM.2/Circ.79	CONVENTION REVIEW PLAN UNDER THE EXPERIENCE-BUILDING PHASE ASSOCIATED WITH THE BWM CONVENTION
BWM.2/Circ.80	GUIDANCE ON BALLAST WATER RECORD-KEEPING AND REPORTING
MEPC 1/Circ.795/Rev.8	UNIFIED INTERPRETATIONS TO REGULATIONS 18.5 & 18.6 OF MARPOL ANNEX VI
MEPC 1/Circ.905	INTERIM GUIDANCE ON THE USE OF BIOFUELS UNDER REGULATIONS 26, 27, 28 OF MARPOL ANNEX VI (DCS AND CII)
MEPC 1/Circ.906	REVISED GUIDELINES FOR THE REDUCTION OF UNDERWATER RADIATED NOISE FROM SHIPPING TO ADDRESS ADVERSE IMPACTS ON MARINE LIFE
MEPC 1/Circ.907	GUIDELINES FOR UNDERWATER RADIATED NOISE REDUCTION IN INUIT NUNAAT & THE ARCTIC
MSC-MEPC 1/Circ.5/Rev.5	ORGANIZATION AND METHOD OF WORK OF THE MARITIME SAFETY COMMITTEE & THE MARINE ENVIRONMENT PROTECTION COMMITTEE AND THEIR SUBSIDIARY BODIES
PPR.1/Circ.7/Rev.1	DECISIONS WITH REGARD TO THE CATEGORIZATION AND CLASSIFICATION OF PRODUCTS

