



SUBJECT: Outcome of Marine Environment Protection Committee (MEPC) meetings and new regulatory requirements

REFERENCE:

a) *Marine Environment Protection Committee (MEPC)*

TO: Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organizations.

1. INTRODUCTION

This Information Notice provides information on the outcome of MEPC meetings and new regulatory requirements.

2. SUBJECT

1. MEPC 80 in July 2023 Overview (Key developments)

1. Adoption of a revised GHG Strategy with strengthened ambitions
2. Adoption of guidelines for lifecycle assessment of marine fuels
3. Approval of amendments to the Data Collection System (DCS) requiring more detailed data on fuel consumption
4. Approval for circular setting out rules for application of biofuels under the DCS and Carbon Intensity Indicator (CII)

2. Explanations

1. MEPC 80 approved amendments to MARPOL Annex VI clarifying the definition of fuel oil and defining gas fuels consistent with the IGF Code. The amendments also state that all fuels require a bunker delivery note, but gas fuels and low-flashpoint fuels are not required to provide information on density, Sulphur content and flashpoint and are also not required to provide a sampling point.
2. MEPC 80 approved amendments to Regulation 13.2.2 of MARPOL Annex VI accepting that marine diesel engines replacing steam systems, as “replacement engines” if complying with the requirements introduced for steam systems with respect to non-identical replacement engines, are not required to meet the Tier III limit. The related Unified Interpretation was updated because of these amendments.
3. MEPC 80 adopted the “Guidelines for Thermal Waste Treatment Devices”. The guidelines are technology-neutral and goal-based and may be applied to any thermal waste treatment device using, for example, gasification, hydrothermal carbonization, pyrolysis or plasma, or other thermal means for the disposal of waste generated on board, as an alternative to conventional incinerators.

4. MEPC 80 approved a Unified Interpretation to Regulations 18.5 and 18.6 of MARPOL Annex VI that the Bunker Delivery Note (BDN) is acceptable in either a hard copy or electronic format.
5. MEPC 80 agreed on a correction of the comparison of tank sizes for dual fuel engines in the EEDI survey and certification guidelines. For gas fuel, the reference to “tank filling” is replaced by a reference to “tank loading limit in the IGF and/or IGC Codes”.
6. The application of the concept of overridable shaft/engine power limitation (ShaPoLi/EPL) under the EEDI framework was discussed. There was no agreement on how it should be applied, although it was agreed that an overridable solution would require adjustments in the NOx Technical Code.
7. MEPC 80 adopted the revised “Guidelines on the Shaft/Engine Power Limitation System to Comply with the EEXI Requirements and Use of a Power Reserve” setting out uniform reporting requirements and a format for reporting on the use of a power reserve to the administration.
8. MEPC 80 agreed on a plan for reviewing the short-term GHG reduction measures, the CII and EEXI. The plan stipulates a data-gathering phase until MEPC 82 in autumn 2024, before analyzing the data and finalizing any amendments to the measures by MEPC 83 in summer 2025. This includes CII reduction requirements from 2026 to 2030 aligned with the carbon intensity target in the revised IMO GHG Strategy. There will be no immediate changes to the CII framework, including correction factors and voyage adjustments, before the review is completed by the end of 2025.
9. MEPC 80 approved amendments to Appendix IX of MARPOL Annex VI, adding further data elements to be reported through the DCS, such as fuel consumption per fuel type and energy consumer and transport work. The amendments also include changes to the accessibility of data in Regulation 27, where data can be made available for consultants contracted by the IMO under a strict confidentiality agreement. Ship companies can now also opt to make the DCS data submitted to the IMO publicly available.
10. MEPC 80 agreed on a circular providing a common approach to account for the use of biofuels under Regulations 26, 27 and 28 of MARPOL Annex VI (DCS and CII). Biofuels that have been certified by an international certification scheme (referring to schemes approved for international aviation), meeting its sustainability criteria and that provide a well-to-wake GHG emissions reduction of at least 65% compared to the well-to-wake emissions of fossil MGO, can use a CO₂ conversion factor equal to the well-to-wake GHG emissions factor. The approach should be considered temporarily until the regulations can apply the methods in the LCA guidelines.

11. The ambitions for international shipping were significantly strengthened from the 50% GHG reduction ambition by 2050 in the initial strategy. The revised strategy now aims for reducing well-to-wake GHG emissions by 20%, striving for 30% in 2030 and then 70%, striving for 80%, in 2040 compared to 2008 and reach net-zero “by or around, i.e., close to, 2050”. There is also a 2030 target to achieve an uptake of zero or near-zero GHG emissions technologies, fuels and/or energy sources, representing at least 5%, striving for 10% of the energy used by international shipping.
12. The GHG Strategy now also addresses life cycle GHG emissions from shipping, with the overall objective of reducing GHG emissions within the boundaries of the energy system of international shipping and preventing a shift of emissions to other sectors.
13. The IMO has decided to implement a basket of measures consisting of two parts; Firstly, a technical element which will be a goal-based marine fuel standard regulating the phased reduction of marine fuel GHG intensity; Secondly, an economic element which will be some form of a maritime GHG emissions pricing mechanism, potentially linked directly to the GHG intensity mechanism.
14. The development of the measures will continue at the IMO and will, according to the agreed timeline, be adopted in 2025 and enter into force around mid-2027.
15. MEPC 80 adopted the “Guidelines on Life Cycle GHG Intensity of Marine Fuels” (LCA Guidelines), which set out methods for calculating well-to-wake and tank-to-wake GHG emissions for all fuels and other energy carriers (eg. electricity) used on board a ship. These guidelines also specify sustainability topics/aspects for marine fuels and define a Fuel Lifecycle Label (FLL) that collects and conveys the information relevant for the life cycle assessment. Preliminary default emissions factors for various fuels and fuel pathways are provided, but these factors will be further reviewed.
16. These guidelines do not include any provision for application or requirements; they are intended to support the GHG Fuel Standard under development. The IMO guidelines will be kept under review and developed further in the coming years, focusing on default emissions factors, sustainability criteria, fuel certification and handling of on-board carbon capture.

3. Items deferred to MEPC 81.

1. On-board CO₂ capture

1. MEPC 80 considered initiating a work process on the application of on-board carbon capture and storage or utilization but decided to postpone further discussion on this matter to the next intersessional meeting of the Working Group on GHG reductions. This is expected to take place the week before MEPC 81 in April 2024 and to be linked to further work on the LCA guidelines.

4. Further amendments

1. MEPC 80 agreed that:
 1. The Red Sea and the Gulf of Aden special areas under MARPOL Annex I will take effect from 1 January 2025.
 2. The Red Sea special area under MARPOL Annex V takes effect from 1 January 2025.
 3. A new PSSA in the North-Western Mediterranean Sea bordering France, Italy, Monaco, and Spain, to protect whales from international shipping, is to be designated.
2. MEPC 80 adopted the revised “Guidelines for the Development of the Inventory of Hazardous Materials” because of the controls on cybutryne included in the Anti-fouling Convention.
3. The Anti-Fouling Systems on Ships Convention (AFS) amendments were adopted to include controls on cybutryne and the format of the International Anti-fouling System Certificate.

Issued by

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