

IMO UPDATE: MARINE ENVIRONMENT PROTECTION COMMITTEE – MEPC 82



The 82nd session of the IMO's Marine Environment Protection Committee (MEPC 82) met in person at IMO Headquarters in London (with hybrid participation) was held from 30 September to 04 October 2024)

MEPC 82 Highlights

- Tackling climate change - cutting GHG emissions from ships and implementing the 2023 IMO Strategy on Reduction of GHG Emissions from Ships
- Energy efficiency of ships – adoption of 2024 Guidelines on SEEMP, 2022 fuel consumption data and 2019-2022 carbon intensity data
- Designation of new Emission Control Areas
- Designation of new Particularly Sensitive Sea Area
- Ballast Water Management Convention implementation
- Addressing marine litter
- Air pollution prevention
- Underwater radiated noise from commercial shipping
- Pollution prevention and response
- Ship Recycling

Tackling climate change - cutting GHG emissions from ships

The Committee made progress on the development of mid-term measures aimed at cutting down greenhouse gas emissions to meet the ambitions set out in the 2023 IMO Strategy on Reduction of GHG Emissions from Ships. These proposed regulations are scheduled for adoption in late 2025, building on previously adopted "short-term measures" for GHG reduction which focus on enhancing energy efficiency of ships. The mid-term measures under discussion include:

- a technical element, i.e., a global marine fuel standard regulating the phased reduction of a marine fuel's GHG intensity; and
- an economic element, i.e., a maritime GHG emissions pricing mechanism.

Draft IMO net-zero framework

Various proposals on the architecture of these mid-term GHG reduction measures have been put forward by Member States. They include the possible establishment of an IMO GHG Intensity Registry and an IMO fund/facility to facilitate the implementation of the technical and economic elements of the GHG reduction measures.

Committee identified further areas of convergence and produced a draft legal text ("draft IMO net-zero framework") to use as a basis for the next phase of talks.

The draft legal text integrates inputs and proposals from Member States and international organizations on possible amendments to be made to the International Convention for the Prevention of Pollution from Ships (MARPOL, Annex VI). If adopted, these amendments would incorporate the proposed new measures into the treaty, which has 107 Parties representing 97.30% of world merchant shipping tonnage.

The next MEPC meeting (MEPC 83) is scheduled for 7-11 April 2025. Between now and the next session, Member States are expected to work to find further areas of convergence and refine the draft text with a view to approval of the amendments at MEPC 83 in April 2025 and adoption in October 2025.

The Committee scheduled the following intersessional meetings to focus on further development of the mid-term measures:

Intersessional Working Group on Reduction of Greenhouse Gas (GHG) Emissions from Ships, 18th session (ISWG-GHG 18), 17-21 February 2025; and

Intersessional Working Group on Reduction of Greenhouse Gas (GHG) Emissions from Ships, 19th session (ISWG-GHG 19), during the week immediately before MEPC 83, scheduled for 7-11 April 2025.

The Working Group will submit a written report to MEPC 83.

Comprehensive impact assessment of mid-term measures to reduce GHG emissions

The proposed mid-term measures will impact the world fleet and Member States, especially Least Developed Countries (LDCs) and Small Island Developing States (SIDS). To guide decision-making, a comprehensive impact assessment was conducted over the past year, focusing on the potential impacts of the candidate measures on the world fleet and on States.

The Committee noted the outcomes of the study and agreed to assess the potential impacts of the measures on food security, particularly on net food importing developing countries.

Further development of the Life Cycle GHG Assessment (LCA) framework

The Committee continued its work on the development of the LCA framework, referring relevant documents to the GESAMP Working Group on Life Cycle GHG Intensity of Marine Fuels (GESAMP-LCA WG), which was established to review scientific and technical issues related to the life cycle GHG assessment of marine fuels.

The Committee invited Member States to start preparing proposals for default emission factors, in order to allow the GESAMP-LCA Working Group to review these after MEPC 83.

Energy Efficiency

MEPC approved, the summary of the fuel oil consumption data submitted to the IMO data collection system (DCS) for 2023.

Since 2019, ships of 5,000 gross tonnes (GT) and above (which produce approximately 85% of the total CO₂ emissions from international shipping) are required to collect consumption data for each type of fuel oil they use as well as other specified information. This data helps to inform the development of measures to reduce GHG emissions from ships, including calculating ships' operational carbon intensity (CII).

In 2023, data was reported by 28,620 ships with a combined gross tonnage of 1,301 million GT and by 105 Administrations out of 135 possible. The data showed that total fuel used by these ships was slightly less in 2023 (211 million tonnes) compared to 2022 (213 million tonnes).

The Committee noted ongoing improvements to the reporting process in the IMO DCS module in GISIS, including the timeline and updates to report transport work and enhance granularity of the reporting from 1 January 2025. The Committee approved, in principle:

- Reporting on carbon intensity developments on the basis of supply-based measurements, using AER and cgDIST indicators; and
- Reporting of Carbon Intensity Indicator (CII) values.

Review of short-term GHG reduction measures

The Committee continued its work to review the 'short-term measures' currently in force to reduce GHG emissions from ships by enhancing the energy efficiency of the global fleet.

These regulations, adopted in 2021 and effective since 01 January 2023, require ships to measure their energy efficiency by calculating their attained Energy Efficiency Existing Ship Index (EEXI), and to continuously improve their annual operational carbon intensity indicator (CII) as defined in their CII rating.

The Committee analyzed data submitted by Member States from their experience with the implementation of the regulations over the past year, as well as various proposals.

A number of key challenges or gaps were identified in these submissions, ranging from CII impact on individual ship assessments of operational energy efficiency performance, potential penalization of ships on short voyages, idle time and port waiting time, to the lack of incentivization for port call efficiency and just-in-time (JIT) arrival of ships.

Improving ship energy efficiency

The Ship Energy Efficiency Management Plan (SEEMP) is an operational mechanism to improve the energy efficiency of a ship in a cost-effective manner, through technology, good practices and the use of recognized monitoring tools.

The Committee adopted Resolution MEPC.395(82) on 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP), which contains amendments to the 2022 Guidelines to enhance the granularity of reports submitted under the IMO Data Collection System (DCS).

The Committee approved the Revised sample format for the confirmation of compliance pursuant to regulation 5.4.5 of MARPOL Annex VI (MEPC.1/Circ.914), regarding early

submission of the SEEMP Part II on the ship fuel oil consumption data collection plan.

The Committee approved draft amendments to appendix IX of MARPOL Annex VI concerning clarification of entries in data reporting to the IMO DCS, with a view to adoption at MEPC 83, as well as the Guidance on the application of the amendments to Appendix IX of MARPOL Annex VI (MEPC.1/Circ.913).

The Committee also approved MEPC.1/Circ.913 on Guidance on the application of the amendments to appendix IX of MARPOL Annex VI adopted by resolution MEPC.385(81) on inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS).

Designation of Emission Control Areas

The Committee adopted Resolution MEPC.392(82) on amendments to MARPOL Annex VI for the designation of the following new Emission Control Areas (ECAs) for Nitrogen Oxides (NO_x), Sulphur Oxides (SO_x) and Particulate Matter (PM):

- Canadian Arctic Waters; and
- Norwegian Sea.

These amendments will enter into force on 1 March 2026.

ECAs are areas where special mandatory measures to regulate emissions from ships are required to prevent, reduce and control air pollution from NO_x, SO_x and PM, and their adverse impacts on human health and the environment.

Proposed Particularly Sensitive Sea Areas

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 (PSSA), following a proposal by Indonesia.

These areas fall within the Coral Triangle, a globally recognized marine biodiversity hotspot. The proposed PSSA aims to enhance protections for its unique and endangered species, safeguarding their critical habitats and the rich biodiversity, and to accommodate the anticipated growth in shipping traffic traversing the Lombok Strait.

Ballast water management – implementation and Convention review

The International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention), entered into force on 8 September 2017 and since then the focus is on its effective implementation.

An ongoing comprehensive review of the BWM Convention will result in a package of amendments to the Convention. In this regard, the Committee progressed the consideration of a number of matters relating to some of these amendments.

- MEPC approved the 2024 Guidance on ballast water record-keeping and reporting (BWM.2/Circ.80/Rev.1), which incorporates guidance on recording operational scenarios related to challenging water quality conditions;
- MEPC 82 approved the 2024 Guidance for Administrations on the type approval process for ballast water management systems (BWM.2/Circ.43/Rev.2) to support harmonized evaluation by Administrations of modifications to a ballast water management system with existing type approval.

Addressing marine litter

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. This provides practical guidance for government authorities on issues such as contingency planning, response, post-spill monitoring and analysis, and intervention and cost recovery.

The Committee instructed the Sub-Committee on Pollution Prevention and Response (at its next session PPR 12) to review the Action Plan to Address Marine Plastic Litter from Ships (resolution MEPC.310(73)) with a view to the effectiveness of the actions being assessed against the intended outcomes.

In addition, the Committee continued discussions on the development of mandatory regulations to address plastic pellets released from ships. These would build on the non-mandatory Recommendations for the carriage

of plastic pellets by sea in freight containers (MEPC.1/Circ.909) approved by MEPC 81, and the Guidelines on good practice relating to clean-up of plastic pellets from ship-source releases approved by MEPC 82.

The Committee instructed PPR 12 to develop text for a specific action (for inclusion in the Action Plan) on the development of mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers.

The Committee also instructed the PPR Sub-Committee to conduct an analysis of the potential mandatory instruments that could be amended and the associated implications.

The outcomes of this analysis will be submitted to a future MEPC session, with a view to the Committee making a policy decision on the preferred mandatory instrument to be amended.

Air pollution prevention

Sulphur emissions

The Committee noted the Secretariat's report on the implementation of the 0.50% sulphur limit. On 1 January 2020, global regulations came into force to improve air quality by limiting the sulphur content of ships' fuel oil to 0.50% (from 3.5% previously).

The data showed that only two reports of ships using non-compliant fuels exceeding the 0.50% sulphur limit (known as FONAR reports) were submitted to IMO's GISIS platform in 2023, out of 67 in total reported since January 2020.

Black carbon emissions

The Committee adopted the following two resolutions prepared by PPR 11:

Resolution MEPC.393(82) on Guidance on best

practice on recommendatory goal-based control measures to reduce the impact on the Arctic of Black Carbon emissions from international shipping

Resolution MEPC.394(82) on Guidelines on recommendatory Black Carbon emission measurement, monitoring and reporting.

Black Carbon is a distinct type of carbonaceous material, formed only in flames during combustion of carbon-based fuels. The Guidance on best practices aims to assist ship operators/companies in their efforts to reduce Black Carbon emissions from their ships operating in or near the Arctic, while the guidelines for measuring, monitoring and reporting will help with data collection to support the development of relevant regulations and recommendations.

Nox Technical code

The Committee approved the following:

The draft amendments to MARPOL Annex VI and associated draft amendments to the NOx Technical Code 2008 on the use of multiple engine operational profiles for a marine diesel engine, including clarifying engine test cycles.

The associated draft amendments to the NOx Technical Code 2008 will be circulated with a view to adoption at MEPC 83, but with the same

entry-into-force date as that of the revised MARPOL Annex VI (which is expected to be adopted in Autumn 2025, consolidating all amendments approved up until MEPC 83 since its latest revision).

The draft amendments to the NOx Technical Code 2008 concerning certification of an existing engine subject to substantial modification or being certified to a tier to which the engine was not certified at the time of its installation. They will be circulated with a view to adoption at MEPC 83.

REDUCING UNDERWATER RADIATED NOISE (URN) FROM COMMERCIAL SHIPPING

The Committee approved amendments to the Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life (Revised URN Guidelines) (MEPC.1/Circ.906/Rev.1), to include an URN management planning reference chart.

The Committee approved the Action Plan for the reduction of underwater noise from commercial shipping (URN Action Plan), to be reviewed and revised as necessary. The URN Action Plan aims to address barriers to the uptake of the Revised URN Guidelines in order to further prevent and reduce URN from ships.

In addition, the Committee agreed to continue with the three-year experience-building phase (EBP) for the Revised URN Guidelines, expected to conclude by MEPC 85 in 2026 but with a possibility of an extension of up to two years if necessary, for experience to be gained and best practices in the use of the Revised URN Guidelines to be developed, followed by a review to make any necessary amendments to the Guidelines.

POLLUTION PREVENTION AND RESPONSE

The Committee approved:

- Revised tank cleaning additives guidance note and reporting form (MEPC.1/Circ.590/Rev.1);
- Guidelines for developing a local

oil/hazardous and noxious substances marine pollution contingency plan; and

- Guidelines on mitigation measures to reduce risks of use and carriage for use of heavy fuel oil as fuel by ships in Arctic waters (MEPC.1/Circ.915)

SHIP RECYCLING

The Hong Kong Convention aims to ensure that ships, when being recycled after reaching the end of their operational lives, do not pose any unnecessary risks to human health, safety and to the environment. The Basel Convention aims to protect human health and the environment against the adverse effects of hazardous wastes, including among others, waste from ship dismantling.

In view of the forthcoming entry into force of the Hong Kong Convention on 26 June 2025 and the urgent need to provide guidance on the

interplay between the two Conventions, the Committee approved the Provisional guidance on the implementation of the Hong Kong and Basel Conventions with respect to the transboundary movement of ships intended for recycling (HKSRC.2/Circ.1).

The Committee noted that additional work was required to improve the guidance in order to provide further legal clarity and certainty, in cooperation with the Secretariat of the Basel Convention.

RESOLUTIONS AND CIRCULARS (PROVISIONAL)

Resolutions /Circulars	Topic
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, sulphur oxides and particulate matter, as appropriate)
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
Resolution MEPC.394(82):	Guidelines on recommendatory black carbon emission measurement, monitoring and reporting draft amendments to the NOx Technical Code 2008 (Use of multiple engine operational profiles for a marine diesel engine, including clarifying engine test cycles)
Resolution MEPC.395(82):	2024 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP)
Resolution MEPC.396(82):	Designating the Nusa Penida Islands and Gili Matra Islands in Lombok Strait as a Particularly Sensitive Sea Area
AFS.3/Circ.6:	2024 Guidance on best management practices for removal of anti-fouling coatings from ships
BWM.2/Circ.43/Rev.2:	2024 Guidance for Administrations on the type approval process for ballast water management systems
BWM.2/Circ.80/Rev.1:	2024 Guidance on ballast water record-keeping and reporting
HKSRC.2/Circ.1:	Provisional guidance on the implementation of the Hong Kong and Basel Conventions regarding the transboundary movement of ships intended for recycling
MEPC.1/Circ.590/Rev.1:	Revised tank cleaning additives guidance note and reporting form
MEPC.1/Circ.906/Rev.1:	Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life
MEPC.1/Circ.913:	Guidance on the application of the amendments to Appendix IX of MARPOL Annex VI (Resolution MEPC.385(81))
MEPC.1/Circ.914:	Sample format for the confirmation of compliance pursuant to Regulation 5.4.5 of MARPOL Annex VI
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

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For INTLREG Services contact us at services@intlreg.org

4770 Biscayne Boulevard 800

Miami, Florida 33137, USA