

## Preliminary Report of IMO MEPC 82

The 82nd session of the International Maritime Organization (IMO) Marine Environment Protection Committee (MEPC 82) was held from 30 September to 4 October 2024. A summary of the outcome is given hereunder for your information.

### **1. Greenhouse Gases (GHG)**

Reduction of greenhouse gas (GHG) emissions to address global warming is a universal challenge, and the measures to reduce GHG emissions from international shipping have been deliberated at IMO. Such measures introduced at the IMO so far include the regulation of Energy Efficiency Design/Existing Ship Index (EEDI/EEI), retaining of the Ship Energy Efficiency Management Plan (SEEMP) onboard, and reporting annual fuel oil consumption data in the IMO Data Collection System (IMO DCS) and its Carbon Intensity Indicator (CII) rating. At MEPC 80 held in July 2023, the 2023 IMO Strategy on Reduction of GHG Emissions from Ships (2023 IMO GHG Strategy) was adopted, establishing the IMO's reinforced levels of ambition (see table below) and proposed measures for GHG reduction, to lead further discussions with an aim to accomplish the goals of GHG reduction from international shipping.

Target year	Levels of ambition and indicative checkpoints (as of 2023)
2030 (compared to 2008)	<ul style="list-style-type: none"> <li>• To reduce CO<sub>2</sub> emissions per transport work by at least 40%</li> <li>• To reduce total annual GHG emissions by at least 20% (striving for 30%)</li> <li>• Uptake of zero GHG emission fuels etc. to represent at least 5% of the energy used (striving for 10%)</li> </ul>

2040 (compared to 2008)	<ul style="list-style-type: none"> <li>• To reduce total annual GHG emissions by at least 70% (striving for 80%)</li> </ul>
2050	<ul style="list-style-type: none"> <li>• To reach net-zero GHG emissions by or around 2050 at the latest</li> </ul>

At this session, MEPC 82 held continued discussions on developing mid-term measures for reduction of GHG along with various topics such as the review of short-term measures (namely EEI and CII), further operationalization of the Guidelines for Life Cycle GHG Intensity of Marine Fuels, etc.

### **1.1 Mid-term measures for reduction of GHG**

2023 IMO GHG Strategy sets out that, as mid-term measures for achieving the GHG reduction targets for international shipping, a basket of candidate mid-term measures should be developed comprising both a “technical element”, which is a goal-based marine fuel standard regulating the phased reduction of the marine fuel's GHG emission per unit energy (i.e. GHG intensity), and an “economic element”, which is based on a maritime GHG emission pricing mechanism.

The following work plan was previously agreed at MEPC 80 for developing mid-term measures, aiming for entry into force by 2027:

Timeline	Work Item
2023-2024	Conduct a comprehensive impact assessment (CIA) to assess potential impacts towards various countries and international shipping posed by combinations of respective basket of candidate measures, and finalize the mid-term measures
2025	Approval and adoption of the mid-term measures
2027	Entry into force of the mid-term measures

At the previous session, the “IMO net-zero framework” was agreed, illustrating an outline of regulatory amendments to be considered, and the IMO Member States and international organizations were then invited to continue with discussions towards finalizing mid-term measures on the basis of the framework.

Furthermore, the results from the CIA, which was conducted by organizations such as UNCTAD etc., were submitted as reports to this session in order to take into account the corresponding results in developing the proposed basket of candidate measures.

At this session, the various points of discussion regarding mid-term measures were consolidated as text options for relevant regulations; however, the Committee was not able to finalize the draft mid-term measures. Many unresolved topics still remain, such as calculating methods of GHG emissions on the life cycle basis, the level of GHG intensity and pricing regulations to be set out, and management and distribution of revenues collected through the pricing mechanism. Further discussions will continue with the aim to adopt mid-term measures within 2027.

Regarding the results from the CIA, a number of delegations expressed concerns that the impacts to States from transportation cost perspectives, in particular on essential food commodities, have not been properly assessed. Thus, it was agreed to carry out further work on assessing consequential impacts in terms of food security.

## **1.2 Review of short-term measures for reduction of GHG**

MARPOL Convention Annex VI prescribes that a review of the EEXI (Energy Efficiency Existing Ship Index) and CII rating regulations, introduced by IMO as short-term measures, shall be completed by 1 January 2026 to assess their effectiveness.

In addition, it was agreed to investigate the effectiveness of the CII rating regulations in terms of a number of proposals submitted by Member States and international organizations, addressing concerns such as ship sizes and operational conditions both positively and/or negatively affecting the CII rating.

At this session, initial analysis on the available data and proposals from Member States and international organizations was conducted in order to proceed with the review of the short-term measures. This session also developed a consolidated list of challenges and gaps in the short-term measures, which will be used as the base document for subsequent discussions at the relevant Correspondence Group and Intersessional Working Group.

## **1.3 Operationalization of the Guidelines on Life Cycle GHG Intensity of Marine Fuels**

For low/zero-carbon fuels, such as hydrogen, ammonia and biomass-based fuels which are expected to become more widely used in the future to decarbonize ships, it has been recognized that GHG emissions during manufacturing and distribution processes of these fuels should be taken into account. It is also recognized that GHG other than CO<sub>2</sub>, such as methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O), may cause significant impact on global warming.

At the previous session, amendments were made to the LCA Guidelines adopted at MEPC 80 and were adopted as the 2024 LCA Guidelines, and it was also agreed that further investigations will be pursued by the Working Group on the Life Cycle GHG Intensity of Marine Fuels (GESAMP-LCA WG) newly established under GESAMP so as to seek their scientific review and advice.

At this session, Member States and international organizations were invited to submit proposals for default emission factors in order to allow the GESAMP-LCA WG to review default emission factors for each fuel. Also, Member States and international organizations were further invited to propose a certification framework for sustainable fuels to MEPC for consideration by GESAMP-LCA WG in developing a fuel certification scheme.

#### **1.4 Guidance for collecting data in IMO DCS**

At the previous session, the amendments to MARPOL Annex VI Appendix IX were adopted, including the amendments and additions to the items required to be reported in the IMO DCS, such as total fuel oil consumption per combustion systems and actual transport work. These amendments will enter into force on 1 August 2025, but the Parties are further invited to consider early application of the amendments from 1 January 2025.

However, having noted that the data reported to IMO is collected annually per calendar year, it was pointed out that the data collected before and after the date of entry into force may contain data in an inconsistent format.

At this session, in order to allow data reporting in a consistent format throughout the year 2025, a guidance was approved, which essentially allows that data collection according to the amended data format may be commenced from 1 January 2026 for existing ships. It was also confirmed that the guidance does not preclude a voluntary early application of the amendments.

#### **1.5 Initiation of the Fifth IMO GHG Study**

IMO periodically conducts a study, providing estimates such as GHG emissions from international shipping. The most recent study was the Fourth IMO GHG Study published in 2020, which presents the emission statistics between 2012 and 2018 and also GHG emission per transport work. It is to be noted that the GHG emission considered in the Study is only associated with onboard (Tank-to-Wake) emissions.

The 17th session of Intersessional Working Group

on Reduction of GHG (ISWG-GHG 17), held immediately before this MEPC session, initiated the consideration of Fifth IMO GHG Study by discussing its Terms of Reference. During the discussions, some comments were made, such as: not only the GHG emissions in 2008, which essentially is considered as the baseline for emissions from international shipping, but also carbon concentration in fuels should be determined; and GHG emissions should be calculated on the Well-to-Wake basis.

It was then agreed to continue with detailed discussions on the Terms of Reference of the Fifth IMO GHG Study at the next session, taking into account the views shared and comments raised at this session.

## **2. BWM Convention**

### **2.1 Modifications to Ballast Water Management Systems (BWMS) with existing type approval**

There have been cases reported, where type-approved BWMS are modified or have their model changed after their installation, such as when the system is found no longer compliant with the Regulation D-2 of the Ballast Water Management (BWM) Convention due to various consequences. Such modifications and changes comprise not only removal of filters but also changes made in UV transmittance system and dosage of active substances. Given that varying approaches are being taken by Member States on whether new type approval should be necessary after such modifications or changes, the industry suggested aligning the views in this regard.

At this session, the amended Guidance for Administrations on the Type Approval Process for Ballast Water Management Systems (MEPC.2/Circ.43/Rev.2) was approved, listing detailed examples of BWMS components and providing guidance on when a new type approval should be necessary or not.

### **2.2 Review of BWM Convention**

The Correspondence Group on Review of the BWM Convention reported to this session the progress of

its work being undertaken since MEPC 80 and held further in-person discussions. The Correspondence Group will continue its work, which will further be reported to MEPC 83.

When BWM Convention entered into force in 2017, it was agreed to monitor the application and to review the effectiveness of the Convention through the experience building phase (EBP), and MEPC 80 approved the Convention Review Plan (CRP) which comprises the list of issues that need to be finalized. MEPC 81 further endorsed the list identifying items that need to be amended within the BWM Convention, BWMS Code and relevant guidelines and guidance, based on the review undertaken by the Correspondence Group.

At this session, the following topics were discussed with an aim to establish common understanding to facilitate further work by the Correspondence Group:

- BWMS maintenance procedures;
- Standardization of BWMS data logs and export files;
- Relationship between BWMS testing conditions and treatment rated capacity (TRC);
- BWMS test duration;
- Test water conditions; and
- Type of analysis of ballast water discharges during surveys.

It was also concluded that the Correspondence Group will not proceed with the consideration of the proposal for regulating disinfection by-products (DBPs) in discharges from BWMS that make use of active substances, given that the matter is not mature enough for consideration.

### **3. Others**

#### **3.1 Ship Recycling Convention**

To conduct dismantling of ships in a safe manner and under appropriate management without environmental pollution, the Ship Recycling Convention (formally “the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009”, a.k.a. “the Hong Kong Convention”) will enter into force on 26 June 2025, where the Convention will apply to all ships of 500

GT or over flying the flag of a ratified Party (see ClassNK Technical Information TEC-1311). On the other hand, the Basel Convention (and its 1995 amendment) prohibits all transboundary movements to particular States of hazardous wastes covered by the Convention that are intended for final disposal.

At the previous session, concerns were raised where ships compliant to the Ship Recycling Convention may not proceed with the final voyage due to the Basel Convention; therefore, the interplay between the Conventions was further investigated.

At this session, the provisional IMO guidance was approved, clarifying that States that are Parties to both the Ship Recycling Convention and the Basel Convention should consider notifying the Secretariat of the Basel Convention so as to express that the States understand that the provisions of the Basel Convention should not affect the transboundary movements that take place pursuant to the Ship Recycling Convention. Member States and IMO Secretariat were also encouraged to continue sharing relevant information towards the implementation of the Ship Recycling Convention.

### **4. Amendments to mandatory instruments**

MEPC 82 adopted amendments to mandatory instruments as follows:

#### **4.1 Addition of Nitrogen Oxides (NO<sub>x</sub>), Sulphur Oxides (SO<sub>x</sub>) and Particulate Matter (PM) Emission Control Areas (ECA)**

Amendments to MARPOL Annex VI were adopted, designating Canadian Arctic Sea and Norwegian Sea as ECA (refer to Attachment 1) and also including detailed dates relevant to the ship's construction into the Form of the Supplement to IAPP Certificate.

Entry into force: 1 March 2026

The sulphur content in fuel oil used for ships operating in these ECA will be limited to 0.10% from 1 March 2027. Furthermore, the NO<sub>x</sub> Tier III emission limit will be applied to the following ships operating in these ECA:

### Application of NOx Tier III Limitations

#### Canadian Arctic ECA

- Ships the keels of which are laid or that are at a similar stage of construction on or after 1 January 2025

#### Norwegian Sea ECA

- Ships for which the building contract is placed on or after 1 March 2026
- In the absence of a building contract, ships the keels of which are laid or which are at a similar stage of construction on or after 1 September 2026
- Ships delivered on or after 1 March 2030

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Fig. 1: Illustration of Canada Arctic ECA

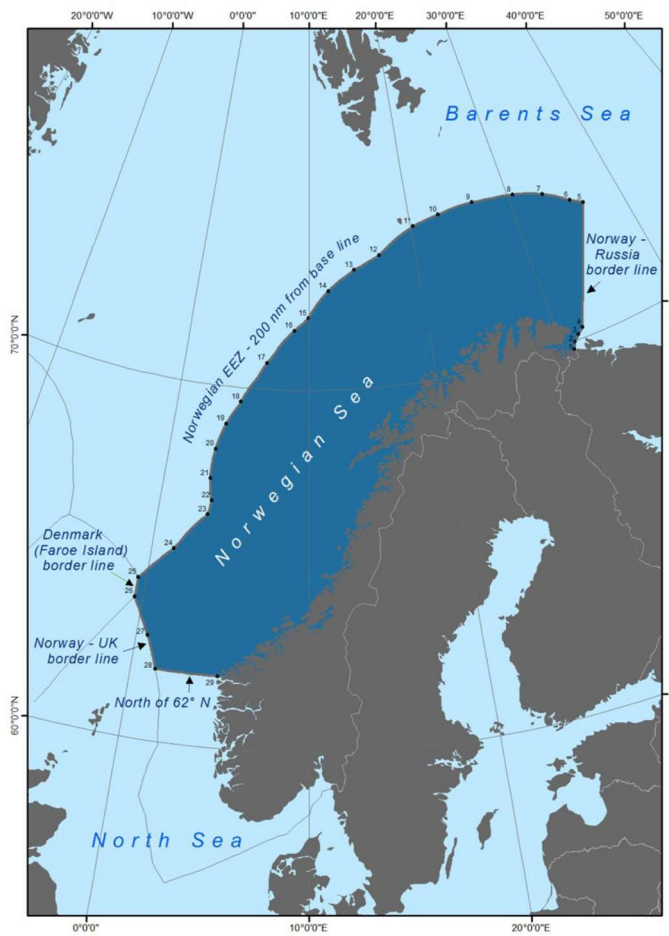


Fig. 2: Illustration of Norwegian Sea ECA