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**IMO MEETING REPORT**

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| DATE: 17 April 2025 | COMMITTEE: MEPC |
| ATTENDEES: Andy Williams | SUB-GROUP: |

This was the 83rd session of the Marine Environment Protection Committee (MEPC), held from 7th to 11th April 2025. I attended remotely on 7th April.

ITEMS OF INTEREST TO THE LEISURE/SUPERYACHT INDUSTRY

**Approval of Mid-term GHG reduction measures -** The Committee finalized and approved the draft amendments to MARPOL Annex VI on the IMO net-zero framework. These amendments are expected to be formally adopted at the Extraordinary Session of MEPC in October 2025. If approved, these amendments will enter into force on March 1, 2027. However, compliance timelines are staggered:

* By 2028, ships will begin collecting data related to their fuel use and GHG emissions.
* From January 2029 onwards, ships will need to submit this data for verification.
* Detailed reporting requirements will commence annually from January 1, 2029.

The regulations will apply to ships with a gross tonnage of 5,000 and above, including yachts.  
  
The GHG Fuel Intensity (GFI) aims to reduce emissions progressively, with defined targets for what qualifies as compliant emissions. Two sets of values for compliance trajectories will guide ships in reducing their GFI from 2028 to 2035, leading to further reductions by 2040.  
  
Ships will need to demonstrate compliance through a variety of certifications, including amendments to their Ship Energy Efficiency Management Plan (SEEMP) to account for the additional data collection requirements. There will be a new IMO GFI Register to manage compliance and allow for the issuance of compliance credits or surpluses.

The regulations will accept a range of alternative fuels, including hydrotreated vegetable oils (HVO), in compliance with sustainability guidelines. The sustainability criteria for these fuels are still under discussion but will likely include aspects such as land use, water use rights, and social development impacts.  
  
Ships that utilize zero or near zero GHG emissions technologies will be eligible for financial rewards if their GFI falls below specified thresholds. The initial threshold of 19 gCO2eq/MJ will be tightened to 14 gCO2eq/MJ by January 1, 2035.  
  
The mid-term measures also anticipate ongoing guidance and regulations concerning the evaluation of fuel pathways, verification of emissions, and accounting for various fuel types to ensure that all pathways are treated equitably within the lifecycle assessment framework. This involves intended revisions to the 2024 Life Cycle GHG Intensity Guidelines and guidelines for the recognition of sustainable fuel certification schemes.  
  
The mid-term GHG reduction measures approved at MEPC 83 represent a critical step in regulating maritime emissions, with both mandatory components and supporting guidelines to facilitate implementation. The structured approach to compliance, data collection, and alternative fuel usage reflects the IMO's commitment to achieving significant reductions in greenhouse gas emissions while promoting sustainable practices in the maritime industry going forward.

The draft MARPOL VI amendments and the indicative list of guidelines, governing provisions, and other guidance accompanying the amendments of the IMO net-zero framework to be developed or to be amended can be found at annexes 1 and 2 respectively of the attached report of the report of the nineteenth meeting of the Intersessional Working Group on Reduction of GHG Emissions from Ships (ISWG-GHG 19) and the Working Group on Reduction of GHG Emissions from Ships in document MEPC 83/WP.11.

**Adoption of amendments to the NOX Technical Code –** The Committee adopted amendments to the NOX Technical Code. These amendments relate to the use of multiple engine profiles for a marine diesel engine, including clarification of engine test cycles as well as certification of an engine subject to substantial modification or being certified to a NOx Tier which it was not certified for at the time of installation.

A new chapter 8 to the NOx Code has been introduced that allows for the approval of switching engine operational profiles under certain conditions:

* Engines certified to switch between different NOx emission tiers in service.
* Engines that can operate under multiple test cycles based on the operational duty performed.
* Engines that maintain the same emission standard, rated power, rated speed, and test cycle but can switch operational profiles in service, affecting their NOx emissions.

The amendments clarify the role of Auxiliary Control Devices (ACDs). They ensure that:

* A rational emission control strategy must be applied when an ACD is inactive, ensuring that emission values at individual operation mode points reflect normal engine operation.
* All ACDs must be declared and justified in their purpose.

The amendments will come into effect on March 1, 2027, with specific implementation dates:

* New individual engines not certified prior must comply by January 1, 2028.
* For a new member engine to a family or group which the parent engine was certified before 1 January 2028, prior to the certification of the member engine it will need to be shown that the engine family or group meet the new requirements by 1 January 2030 based on the date of the EIAPP for the member engine.
* For existing engines, compliance applies only if they undergo substantial modifications after January 1, 2028.
* In the case of identical replacement of an engine installation on or after 1 January 2028 the version of the Code at the time of the EIAPP issuance continues to apply unless the replaced engine is equipped with multiple operational profiles in which case the new requirements apply.

Amendments for re-certifying engines after substantial modifications or certification to a different NOx Tier will take effect on 1 September 2026, with an option for early voluntary implementation. ​ These amendments require an "Engine Emission Test Plan" to be prepared before testing, with supporting guidelines to be issued when the amendments take effect. ​

The amendments to the draft MEPC resolution on amendments to the NOx Technical Code 2008 concerning the use of multiple engine operational profiles for a marine diesel engine, including clarifying engine test cycles can be found at annex 1 of the attached report of the drafting group in document MEPC 83/WP.8. The draft MEPC resolution on amendments to the NOx Technical Code 2008 concerning the certification of an engine subject to substantial modification or being certified to a tier to which the engine was not certified at the time of its installation can be found at annex 2.

**ECAs for SOx and NOx in the North-East Atlantic Ocean –** The Committee established an Emission Control Area (ECA) for NOx and SOx in the North-East Atlantic, covering Greenland, Iceland, the Faroe Islands, the west coast of the UK and Ireland, and extending south to Spain and Portugal. ​

* **NOx Tier III requirements**: Apply to ships with building contracts placed on or after 1 January 2027, keel laying on or after 1 July 2027, or delivery on or after 1 January 2031. ​
* **SOx requirements**: Ships must use fuel oil with sulphur content not exceeding 0.10% m/m, effective from 1 March 2028.

The regulations are expected to be adopted in October 2025 and enter into force on 1 March 2027. ​Full details of the ECA can be found at annex 1 of the attached report of the technical group on the designation of PSSA’s and Special Areas in document MEPC 83/WP.9.

**Potentially Sensitive Sea Areas (PSSAs) –** The Committee has agreed in principle to designate two areas in Peru, the Reserva Nacional Dorsal de Nasca and the Reserva Nacional Mar Tropical de Grau, as Particularly Sensitive Sea Areas (PSSAs). ​ Once adopted, all ships navigating these areas must follow protective measures, including bans on discharging oil, sewage, waste, or pollutants, and restrictions on changing ballast water during transit. ​. Full details of the PSSAs can be found at annexes 2 and 3 respectively of the attached report of the technical group on the designation of PSSA’s and Special Areas in document MEPC 83/WP.9.

**Work programme –** The Committee reviewed its work programme for 2026-2027 and agreed on the following new outputs:

* Assess the implementation of the Hong Kong Convention, including an experience-building phase and potential amendments, with PPR as the sub-committee. ​
* Develop a legally binding framework to manage ships' biofouling and reduce the transfer of invasive aquatic species, with PPR as the sub-committee.
* Amend the NOx Technical Code 2008 to include certification for engines using non-carbon-containing fuels or fuel mixtures, with PPR as the sub-committee. ​
* Create guidelines to manage ammonia effluent from ammonia-fueled ships to protect the marine environment, with PPR as the sub-committee. ​

**Report of the Committee:** The draft report of the Committee is in attached document MEPC 83/WP.1 Rev.1.

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| PRINCIPAL ISSUES:  The agenda for the meeting was as follows:   1. Adoption of the agenda 2. Decisions of other bodies 3. Consideration and adoption of amendments to mandatory instruments 4. Harmful aquatic organisms in ballast water 5. Air pollution prevention 6. Energy efficiency of ships 7. Reduction of GHG emissions from ships 8. Follow-up work emanating from the action plan to address marine plastic litter from ships 9. Experience-building phase for the reduction of underwater radiated noise from shipping 10. Pollution prevention and response 11. Reports of other sub-committees 12. Identification and protection of Special Areas, ECAs and PSSAs 13. Application of the Committee’s method of work 14. Work programme of the Committee and subsidiary bodies 15. Election of the Chair and Vice-Chair for 2025 16. Any other business   Two working groups, one drafting group, one review group and one technical group were established as follows:   1. Working group on air pollution and energy efficiency. The terms of reference of this group were:   With regards to agenda item 5 (air pollution prevention)   1. If time permits, consider document MEPC 83/5, and advise the Committee accordingly.   With regards to agenda item 6 (energy efficiency of ships)   1. based on the progress made during ISWG-APEE 1, finalize phase 1 of the review of the short-term GHG reduction measure, including:    1. Defining the CII reduction (Z) factors for 2027 to 2030.    2. Finalizing the draft amendments to MARPOL Annex VI and associated guidelines regarding IMO DCS accessibility.    3. Finalizing the work plan for phase 2 of the review of the short-term GHG reduction measure. 2. Consider and finalize the draft guidelines for test-bed and onboard measurements of methane (CH4) and/or nitrous oxide (N2O) emissions from marine diesel engines set out in annex 1 to document MEPC 83/6/1, taking into account documents MEPC 83/6/7, MEPC 83/6/15 and MEPC 83/INF.15, and prepare a draft MEPC resolution with a view to adoption at this session. 3. Consider the draft work plan on the development of a regulatory framework for the use of onboard carbon capture and storage with the exception of matters related to accounting of CO2 captured on board ships set out in annex 4 to document MEPC 83/6/1, taking into account documents MEPC 83/6/6, MEPC 83/INF.9, MEPC 83/INF.13 and MEPC 83/INF.18, with a view to finalization. 4. Prepare draft terms of reference for the re-establishment of the Correspondence Group on Measurement and Verification of Non-CO2 GHG Emissions and Onboard Carbon Capture, using the draft terms of reference set out in paragraph 117 of document MEPC 83/6/1 as a basis. 5. If time permits, consider the information and proposals related to the IMO DCS in document MEPC 83/6/2, and advise the Committee accordingly. 6. If time permits, consider the information and proposals related to the EEDI and EEXI frameworks set out in documents MEPC 83/6/3. MEPC 83/6/5, MEPC 83/6/12, MEPC 83/INF.6 and MEPC 83/INF.7, and advise the Committee accordingly. 7. Working group on reduction of GHG emissions from ships. The terms of reference for this group were:   The Intersessional Working Group on Reduction of GHG Emissions from Ships is instructed, taking into account relevant documents, including documents submitted to ISWG-GHG 18, the outcomes of the comprehensive impact assessment of the basket of candidate mid-term measures as appropriate, the discussions of the Expert Workshop (GHG-EW 6) on the Further Development of the Basket of Mid-term Measures, and relevant documents submitted to MEPC 83 as well as to previous sessions, to:   * 1. Further consider the development of the basket of candidate mid-term GHG reduction measure(s), using annex 1 to document MEPC 82/WP.9 as the basis.   2. Further consider the development of the IMO Life Cycle GHG Assessment (LCA) framework.   3. Drafting Group on amendments to mandatory instruments. The terms of reference for this group were:   1. Prepare the final text of the draft amendments to the NOx Technical Code 2008 concerning:    1. The use of multiple engine operational profiles for a marine diesel engine, including clarifying engine test cycles, using document MEPC 83/3 as the basis and taking into account document MEPC 83/3/2.    2. The certification of an engine subject to substantial modification or being certified to a tier to which the engine was not certified at the time of its installation, using document MEPC 83/3/1 as the basis. 2. Sssess the implications for capacity-building and technical cooperation and assistance of the amendments submitted for adoption at this session, based on the procedures and criteria for the identification of capacity-building implications set out in annex 2 to the Committees' method of work (MSC-MEPC.1/Circ.5/Rev.5), and advise the Committee as appropriate.     4. Technical Group on the designation of a PSSA. The terms of reference of this group were:   1. Taking into account the criteria set out in section 3 of appendix III to MARPOL Annex VI, further assess the proposal for designating the North-East Atlantic Ocean as an ECA for SOx, PM and NOx, as proposed in document MEPC 83/12. 2. Review the proposals to designate the Nasca Ridge National Reserve (MEPC 83/12/1) and the Grau Tropical Sea National Reserve (MEPC 83/12/2) as PSSAs, taking into account documents MEPC 83/12/4, MEPC 83/12/5, MEPC 83/12/6 and MEPC 83/12/7, as appropriate, with a view to assessing whether the proposals meet the provisions of the Revised PSSA Guidelines (resolution A.982(24), as amended by resolution MEPC.267(68)), and whether all the information required by the Guidance document for submission of PSSA proposals to IMO (MEPC.1/Circ.510) had been provided, and advise the Committee on action as appropriate.   5. Ballast water review group. The terms of reference of this group were:   1. Consider the topics that would benefit from in-person discussion to advance their resolution or to decide if consequential amendments would be required, as set out in paragraphs 16 to 23 of document MEPC 83/4/4, as well as the proposals, comments and information in documents MEPC 83/4/5, MEPC 83/4/7, MEPC 83/4/11, MEPC 83/4/12, MEPC 83/4/13, MEPC 83/4/14, MEPC 83/4/15 and MEPC 83/INF.4, with a view to informing and facilitating the further work of the Correspondence Group on Review of the BWM Convention. 2. Consider the progress of the Convention review and the way forward for the completion of the review, taking into account the Convention Review Plan (BWM.2/Circ.79), and advise the Committee accordingly. 3. Prepare draft terms of reference for the re-establishment of the Correspondence Group on Review of the BWM Convention. 4. Consider the proposals in document MEPC 83/4/9 regarding the control of the discharge of disinfection by-products from BWMS, taking into account the information in documents MEPC 83/INF.22 and MEPC 83/INF.28, and advise the Committee accordingly. 5. Consider the proposals in document MEPC 83/4/6 regarding exemptions from ballast water management requirements under regulation A-4 of the BWM Convention and advise the Committee accordingly. 6. Consider the proposals in documents MEPC 83/4/8 and MEPC 83/4/10 regarding operational challenges and implications for ships implementing the Interim guidance on the application of the BWM Convention to ships operating in challenging water quality conditions, taking into account the information in document MEPC 83/INF.21, and advise the Committee accordingly. |
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| ATTACHMENTS/SUPPORTING DOCUMENTATION: |