

**IMO MEPC 82
Meeting Summary**

October 22, 2024



The 82nd meeting of the Marine Environment Protection Committee (MEPC 82) was held 30 September – 4 October 2024 at the IMO Headquarters in London, supplemented by hybrid (remote) participation. This report includes the outcome of the Intersessional Working Group on Reduction of GHG Emissions from Ships (ISWG-GHG 17) held 23-27 September 2024. LISCR participated in the following group in addition to the plenary:

ID	Subject
Working Group (WG1)	Air pollution and energy efficiency
Working Group (WG2)	Reduction of GHG emissions from ships
Drafting Group (DG)	Amendments to mandatory instruments
Technical Group (TG)	Designation of PSSA
Review Group (RG)	Ballast water management

Reduction of Greenhouse Gas (GHG) Emissions, Energy Efficiency and other air pollution matters

GHG short-term measures

There were several unresolved issues regarding the short-term GHG measures adopted by Resolution MEPC.328(76) and its associated guidelines, particularly the correction factors and voyage adjustments in the calculation of the Carbon Intensity Indicator (CII).

MEPC 82 developed a work plan and assigned the Correspondence Group to continue addressing these matters. MEPC 82 also agreed to hold an Intersessional Working Group meeting in March 2025 to finalize the review of the CII, in line with Regulation 28 of MARPOL Annex VI.

At MEPC 82, the primary focus of discussions was on aligning with the levels of ambition set forth in the 2023 IMO Strategy for the reduction of GHG emissions from ships, rather than resolving the outstanding correction factors in the CII guidelines. As a result, most proposals regarding correction factors have been deferred to Phase 2, which will commence after January 1, 2026. However, the classification of Phase 1 (before 1 January 2026) and Phase 2 (after phase 1) is not definite, and there is room for flexibility depending on the interrelationship of the issues and priorities.

GHG Mid-term measures

The 2023 IMO Strategy on the Reduction of GHG Emissions from Ships (2023 IMO GHG Strategy) (resolution MEPC.377(80)) states that mid-term measures should be adopted in autumn 2025, following the approval of a draft text in spring 2025.

Following the 17th session of the International Working Group on the Reduction of GHG Emissions from Ships (ISWG-GHG 17), held 23–27 September 2024, MEPC 82 further advanced the development of mid-term measures. These measures are scheduled for adoption in October 2025, with entry into force expected in 2027.

The IMO is currently working on a consolidated draft text of amendments to MARPOL Annex VI. This draft incorporates all converged proposals as options.

Key points include:

- The measures consist of both technical and economic components.
- Both measures will apply to both new and existing ships.
- Technical requirements by way of a global GHG fuel standard, likely focusing on the carbon intensity of fuels, may be progressively tightened on an annual basis or reviewed over a longer period, aiming for zero emissions around 2050. Over-compliance may be credited or pooled for use by other ships.
- Economic options were divided among Liberia’s co-sponsored fixed levy, emissions credit trading, or a combination of both. Another option under consideration is to merge the economic element into the global GHG fuel standard.
- Discussions regarding the management and use of the funds are still in the early stages. However, the general consensus is to use the collected funds to bridge the price gap between current fuels and zero/near-zero emission fuels, fund innovation and new technologies, and provide support to Small Island Developing States (SIDS) and Least Developed Countries (LDCs).

MEPC 82 also produced an indicative list of supporting guidelines.

The IMO Secretariat was tasked with reporting on the human resource impacts to MEPC 83. Two intersessional working group (ISWG) meetings are scheduled between MEPC 82 and MEPC 83.

Life Cycle GHG Assessment (LCA) framework

Life Cycle Assessment (LCA) defines the carbon content of fuel across its entire lifecycle—from production and transportation to its combustion or use onboard ships. This is referred to as the “well-to-wake” (WtW) approach. While the goal of this work is technology-neutral and not tied to specific regulations or requirements, it may serve as a supporting tool for mid-term measures.

The IMO developed the *2024 Guidelines on the Life-Cycle GHG Intensity of Marine Fuels (2024 LCA Guidelines)* (resolution MEPC.391(81)). Further updates are underway to address sustainability criteria, which focus on minimizing negative social impacts caused by the production of carbon-neutral fuels. Part of this technical work has been assigned to the United Nations Group of Experts on the Scientific Aspects of Marine Environmental Protection (GESAMP) group, with additional efforts being addressed within the MEPC.

Comprehensive impact assessment

The IMO, with the help of various expert consultants overseen by a Steering Committee, produced a report on the impact of candidate mid-term measures on shipping and the economies of States, particularly Small Island Developing States (SIDS) and Least Developed Countries (LDCs). The report indicated that the potential impacts of these mid-term measures are limited. MEPC 82 acknowledged that the study was based on various assumptions and agreed with its findings in principle. However, it instructed the IMO Secretariat to conduct an additional impact assessment specifically focusing on food security.

IMO GHG study

The IMO GHG Study investigates greenhouse gas (GHG) emissions from ships and may be used to inform the review of the next IMO GHG Strategy in 2028. The IMO Secretariat has been tasked with developing a work plan to support this process.

SO_x Control

The IMO Secretariat summarizes relevant information reported to the IMO regarding the global 0.50% sulfur limit (IMO 2020) and presents the results of the sulfur monitoring program for 2023. The report indicates that a total of 4,813 units of exhaust gas cleaning systems (EGCS) have been approved for onboard use.

Submissions regarding the control of wash water from these units were also discussed. MEPC 82 tasked the 12th session of the Sub-Committee on Pollution Prevention and Response (PPR 12) to further consider the draft terms of reference for GESAMP in establishing a standard method for calculating emission factors.

NO_x control

Multiple engine operational profiles

Following discussions by the PPR Sub-Committee, MEPC 82 approved draft amendments to MARPOL Annex VI and associated draft amendments to the NO_x Technical Code 2008 regarding the use of multiple engine operational profiles for marine diesel engines. These amendments are scheduled for final adoption by MEPC 83, set for April 2025.

Key features of the amendments include:

- The current test cycles will remain unchanged, with clarifications provided.
- All possible controls and settings, including the use of an Auxiliary Control Device (ACD), must be declared to the Administration and documented in the technical file.
- There should not be an unreasonable reduction at the test points (mode points).
- Additional test points (mode points) are required.

Certification of an engine subject to substantial modification

MEPC 82 approved draft amendments to the NO_x Technical code for adoption by MEPC 83. MEPC 82 also approved, in principle, *draft guidance on the content of the Engine Emission test plan*, for concurrent adoption by MEPC 83.

Key features are:

- The procedure applies to an Individual Engine or to an Engine Group represented by the Parent Engine. It shall not be accepted for Engine Family certification; and
- Instead of 100%, 85% load is allowed.

Special Areas, ECAs and PSSAs

MEPC 82 adopted by resolution MEPC.392(82) the new emission control areas as given below ECAs for the control of NO_x, SO_x and Particulate Matter (PM). The amendments includes the "Supplement to International Air Pollution Certificate (IAPP Certificate) on Record of Construction and Equipment".

While the entry into force date is set for 1 March 2026, the enforcement dates are outlined below.

Norwegian sea

Norwegian sea area has the three dates application criteria for new building in relation to the NO_x control, i.e.:

- Contract on or after 1 March 2026; or
- Keel laying on or after 1 September 2026; or
- Delivery on or after 1 March 2030.

The SO_x control (0.10% sulphur contents (M/M) is expected to take effect on 1 March 2027.

Canadian Arctic

Canadian Arctic has a single application criterion on NO_x control based on keel laying i.e. ships constructed (keel laid) or after 1 January 2025.

The SO_x control (0.10% sulphur contents (M/M) is expected to take effect on 1 March 2027.



Figures presented in the submission by Norway (MEPC 81/11/1)



Figures presented in the submission by Canada (MEPC 81/11)

Enhancing granularity of fuel consumption data reporting

Implementation date

MEPC 81 adopted amendments to MARPOL Annex VI, Appendix XI, regarding the enhancement of granularity in the Data Collection System for Fuel Oil Consumption (DCS) by Resolution MEPC.385(81), which will enter into force on 1 August 2025. However, this raised the question of whether data granularity should change mid-year or if the new data set with enhanced granularity should start on 1 January 2026. Some States may choose to initiate detailed data reporting from 1 January 2025, in accordance with paragraph 4 of the resolution.

To address this question, MEPC 82 approved MEPC.1/Circ.913 on *Guidance regarding 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 Oil Consumption Database (IMO DCS), to clarify that the starting dates for enhanced reporting can be either 1 January 2025 or 1 January 2026.

Change of flag

While DCS data (Regulation 27 of MARPOL Annex VI) are reported by both losing and gaining flag States if there is a change of flag in the middle of the calendar year, the CII rating (Regulation 28) is reported only by the gaining States for the entire year.

MEPC 82 approved amendments to Appendix IX of MARPOL Annex VI to clarify this practice by specifying the reporting periods for Regulations 27 and 28. These amendments may be adopted at an extraordinary session of MEPC scheduled for October 2025, along with other amendments to MARPOL Annex VI.

Consequential amendments to SEEMP guidelines

As a consequence of the amendments to Appendix IX of MARPOL Annex VI adopted by Resolution MEPC.385(81), MEPC 82 adopted Resolution MEPC.395(82) on *2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*.

Sample format for confirmation of compliance (MEPC.1/Circ.876)

The 10th session of the IMO Sub-Committee on Implementation of IMO Instruments (III 10) noted an error in the sample format for Confirmation of Compliance (MEPC.1/Circ.876), which was corrected by MEPC.1/Circ.914 on *Revised Sample Format for the Confirmation of Compliance Pursuant to Regulation 5.4.5 Of MARPOL Annex VI*. The amendments update the referenced resolution.

Sludge correction in DCS and CII

There was a submission on an analysis of the quantity of oil residue/sludge discharged as a result of using residual fuels and its differing impacts on methods for fuel oil consumption data collection. It was proposed to revise *the 2022 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP)* and *the 2022 Guidelines for Administration Verification of Ship Fuel Oil Consumption Data and Operational Carbon Intensity* when reviewing the short-term GHG reduction measures, in order to minimize the impact of oil residue/sludge correction on various methods of fuel consumption data collection. MEPC 82 did not agree to deduct fuel consumption based on unused fuel that is disposed of as sludge, as experts in the working group emphasized the use of flow meters rather than relying on BDNs.

Another submission pointed out that, due to water contamination in marine fuels, the bunker delivery note (BDN)-based fuel oil consumption data may not be accurate. Corrections could be made based on fuel sampling data. MEPC 82 did not agree on this proposal as well.

Availability of biofuel

Several Member States proposed an amendment to the IMO Global Integrated Shipping Information System (GISIS) module "MARPOL Annex VI" to include information on the availability of bio marine fuels at ports, based on the emerging necessity for the use of bio marine fuels in international shipping.

MEPC 82 agreed to create new modules in GISIS regarding the availability of biofuels in ports.

Black Carbon

Reduction guidelines

MEPC 82 adopted 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*.

This guidance is intended to assist ship operators and the ISM companies in their efforts to reduce Black Carbon (BC) emissions from their ships operating in or near the Arctic in measurable and concrete ways:

- The ship operator or company may consider setting a voluntary BC emission reduction target threshold.
- After establishing such a target threshold, the ship operator or company should identify and evaluate what practices and/or control measures are available to the ship that could be implemented to achieve the established reduction target threshold for BC emissions.
- The ship operator or company should consider developing a BC Management Plan that incorporates the above points and includes periodic monitoring to manage and ensure success in reduction efforts.

The guidelines provide “Technology options, measures, applicability, and other considerations for BC control policies.” However, these are intended for information purposes only and do not mandate or recommend any specific measures.

Measurement and reporting

MEPC 82 adopted resolution MEPC.394(82) on *Guidelines on Recommendatory Black Carbon Emission Measurement, Monitoring and Reporting*.

The purpose of these Black Carbon Guidelines is to specify the recommendations for the measurement, monitoring and reporting of BC emissions data from marine diesel engines or exhaust gas treatment systems, in combination or individually, in order to enhance development of recommendations and regulations to reduce the impact on the Arctic of BC emissions. The guidelines attach a detailed reporting protocol, which specifies items to be included in such a report.

BC measurements should be undertaken at least once for each period with a total duration of seven days while operating in or near the Arctic, at the running load of the marine diesel engine. The guidelines anticipate future development of measurement technology and allow the use of alternative methods of measurement.

Ballast water management

BWM Convention review plan

In July 2017, MEPC 71, through resolution MEPC.290(71) on *the experience-building phase associated with the BWM convention*, agreed to relax enforcement until data gathering, data analysis and convention review are completed. MEPC 82 further worked on this subject.

Key progress at MEPC 82 are:

- In principle, accept ballast water exchange (BWE) on high seas as a compliance measure in exceptional cases to deal with challenging water conditions and contingency measures. With regard to discharge of ballast water on the high seas based on ‘any other port State requirement, MEPC 82 recommended the CG to further consider deleting or replacing this generic clause with more specific language clearly indicating the particular reasons for conducting

BWE+T other than those already listed in the agreed draft amendment to regulation A-3, namely operation in challenging water conditions and contingency measures, should any such additional reasons be identified.

- Agreed to a revision of regulation B-1 to include an overall maintenance schedule of the ballast water management system (BWMS) in the ballast water management plan (BWMP) for ease of reference and simply referring or otherwise linking to the Operation, Maintenance and Safety Manual (OMSM) for detailed procedures.
- A simple amendment to Regulation B-2 was agreed upon to require the inclusion of ballast water management system (BWMS) maintenance in the Ballast Water Record Book (BWRB). This should be done in accordance with the Operational, Maintenance, and Safety Manual (OMSM). If an equivalent onboard recording system exists—such as one required by the ISM Code—only basic information needs to be entered in the BWRB, along with a reference to the OMSM and the onboard recording system for detailed records. For ships not subject to the ISM Code, detailed maintenance information should be entered in the BWRB unless a separate maintenance log is being maintained. For ships that are subject to the ISM Code, maintenance records should also be included in the ballast water record book.
- MEPC 82, despite intense discussion on the analysis methods of ballast water during future flag State surveys, could not conclude whether the analysis should be indicative (simple) or detailed.

The correspondence group (CG) was tasked to continue the work.

Modifications to BWMS with existing type approval

MEPC 82 approved BWM.2/Circ.43/Rev.2 on *2024 Guidance for Administrations on the type approval process for ballast water management systems*.

The Guidance presents examples of:

- Major components;
- Changes or modifications affecting major components; and
- Minor components.

The Guidance states that, for modifications to major components, Administrations should follow the BWMS Code and guidelines developed by the IMO to determine any associated testing requirements.

Guidance on ballast water record-keeping and reporting

MEPC 82 approved BWM.2/Circ.80/Rev.1 on *2024 Guidance on ballast water record-keeping and reporting*. The revision addresses additional examples to be added for providing guidance on recording ports with challenging water quality (PCWQ) related operational scenarios.

Disinfection by-products (DBPs)

A submission paper stated that for some parameters of disinfection by-products (DBPs), such as trihalogenated methane (THM) and halogenated acetic acid (HAA), “the range of concentrations recorded across the various BWMS were significantly higher than reported in the relevant type approval documents,” and DBP concentrations were described as being of “potential environmental concern”.

MEPC 82 recognized that this matter was not mature enough for consideration under the ongoing review of the BWM Convention and was complex, requiring extensive technical consideration. MEPC 82 agreed that this matter would not be further considered by the CG at this time invited Members to present concrete proposals.

Type-approval

MEPC 82 granted final approval for HiBallast 2.0™ ballast water management system in accordance with *Procedure for approval of ballast water management systems that make use of Active Substances (G9)* (resolution 169(57)).

MEPC 82 also noted the information provided by Liberia on the type approval of EcoGuardian NFTM Ballast Water Management System.

Plastic litters

Reduction of environmental risks associated with maritime transport of plastic pellets

MEPC 81 (April 2024) approved MEPC.1/Circ.909 on *Recommendations for the carriage of plastic pellets by sea in freight containers*. MEPC 82 examined the rest of the PPR 11 report and noted that, in light of the divergent views expressed, more time was required to consider which instruments could form the legal basis for mandatory provision.

Proposed guidelines on clean-up of plastic pellets from ship-source spills

The guidelines were approved as the IMO's sales publication.

Action Plan to address marine plastic litter from ships

MEPC 82 instructed PPR 12 to further review the action plan, taking into account the documents submitted to MEPC 82.

Underwater noise

Underwater radiated noise (URN)

Following the discussion by SDC 10, MEPC 82 approved amendments to the *Revised URN Guidelines (MEPC.1/Circ.906)* for circulation as MEPC.1/Circ.906/Rev.1.

The revision introduces the reference chart that supports the preparation and implementation of URN management planning for various parties. The reference chart was developed to support the implementation of the existing guidelines and does not contain any new provisions or technical recommendations.

URN Action Plan

MEPC 82 approved the *Action Plan for the reduction of underwater noise from commercial shipping*. Key points are:

- The action plan addresses barriers to the uptake of the Guidelines in order to further prevent and reduce URN from ships;
- The plan sets up a 3-year experience building phase (EBP) of implementing MEPC.1/Circ.906, starting from July 2023, with the possibility of extending it by two more years;
- It includes short (during EPB), mid (3-6 years) and long-term (beyond 6 years) actions;
- The Action Plan to further prevent and reduce URN from ships has been developed to guide the IMO's continued work on this issue and provides a mechanism to identify specific outcomes and indicative actions to achieve these outcomes in a way that is meaningful and measurable;

- As a part of the action plan, a roadmap after the Experience Building Phase for further reduction was created;
- Other elements included in the action plan are:
 - data gathering;
 - enhancement of public awareness;
 - standardization of noise measurement;
 - develop Underwater Radiated Noise Targets; and
 - encouraging study.

Guidance on the Experience-Building Phase (EBP)

MEPC 82 approved *the Guidance on the Experience-Building Phase (EBP) for the Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life* (MEPC.1/Circ.906/Rev.1).

Key points include:

- URN Management Planning, including URN baselining, management plan development and target setting;
- Design and technical noise reduction approaches;
- Maintenance and operational approaches;
- Energy efficiency and URN reduction;
- Evaluation and monitoring;
- Incentivization; and
- Training and raising awareness.

The guidance document states that any necessary changes to the revised guidelines (*MEPC.1/Circ.906*) may only occur after the completion of the EBP and after lessons learned and analysis of data have been considered by MEPC.

Special areas

Establishing particularly sensitive sea areas (PSSA)

MEPC 82 designated the Nusa Penida Islands and Gili Matra Islands in Lombok Strait as a PSSA in accordance with the revised PSSA Guidelines (resolution A.982(24), as amended by resolution MEPC.267(68)), and adopted MEPC.396(82) on *Designating the Nusa Penida Islands and Gili Matra Islands in Lombok Strait as a Particularly Sensitive Sea Area*.

The area identified are already benefited from existing protective measures adopted through a Traffic Separation Scheme (TSS) in the Lombok Strait, adopted in 2019 by MSC 101 (COLREG.2/Circ.74 and SN.1/Circ.337), and these measures were suitable associated protective measures (APMs) that could reduce the risks from international shipping to the attributes identified in the proposed PSSA.

Biofouling management in PSSAs and MPAs

MEPC 82 encouraged members to pay particular attention to biofouling in the sensitive (protected) sea areas.

Oil and Chemicals

Carriage of chemicals in bulk

MEPC 82 endorsed MEPC.2/Circ.29 on *Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code*, which took effect on 1 January 2024.

Evaluation of cleaning additives

MEPC 82 approved MEPC.1/Circ.590/Rev.1 on *Revised tank cleaning additives guidance note and reporting form*.

Contingence plan

MEPC 82 approved *the Guidelines for developing a local oil/hazardous and noxious substances marine pollution contingency plan* which will be produced as the IMO's sales publication.

This guide is aimed primarily at key local governmental institutions to assist them in developing a marine pollution contingency plan covering their responsibilities.

Heavy fuel cargo in Arctic waters

MEPC 82 approved MEPC.1/Circ.915 on *Guidelines on mitigation measures to reduce risks of use and carriage for use of heavy fuel oil as fuel by ships in Arctic waters*. The Guidelines supplement the amendments to Annex I of the MARPOL Convention on the prohibition of the use and carriage of Heavy Fuel Oil in the Arctic by adopted by resolution MEPC.329(76), which entered into force on 1 July 2024. For ships with protected fuel tank arrangements and domestic ships can be exempted from the ban until 1 July 2029. The ban does not include carriage as cargo.

Others

Ship recycling

MEPC 82, in order to resolve the gap between the Basel Convention and the Hong Kong Convention, approved HKSRC.2/Circ.1 on *Provisional guidance on the implementation of the Hong Kong and Basel Conventions with respect to the transboundary movement of ships intended for recycling*, which recommends actions for parties to the Basel Convention and the Hong Kong Convention.

Anti-fouling system

Following the discussion at the London Convention meeting, MEPC 82 concurrently approved AFS.3/Circ.6 on *2024 Guidance on Best Management Practices for Removal of Anti-Fouling Coatings from Ships*

Further information

For further information please contact: imo@liscr.com

Annex

Provisional list of approved/adopted circular/resolution

ID	Title
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)
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
MEPC.394(82)	Guidelines on Recommendatory Black Carbon Emission Measurement, Monitoring and Reporting
MEPC.395(82)	2024 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP)
MEPC.396(82)	Designating the Nusa Penida Islands and Gili Matra Islands in Lombok Strait as a Particularly Sensitive Sea Area
MEPC 82/17/Annex 11	Policy for Consideration and Approval of Unified Interpretations
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)) on inclusion of Data on Transport Work and Enhanced Granularity in the IMO Ship Fuel Oil Consumption Database (IMO DCS)
MEPC.1/Circ.914	Revised 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
IMO Sales publication	Guidelines on clean-up of plastic pellets from ship-source spills
IMO Sales publication	the Guidelines for developing a local oil/hazardous and noxious substances marine pollution contingency plan