

# IMO PPR 12 Meeting Summary

20 February 2025



The 12th session of the IMO Sub-Committee on Pollution Prevention and Response (PPR) was held 27-31 January 2025 at the IMO Headquarters in London. The meeting was supplemented by hybrid (remote) participation. LISCR participated in the following groups in addition to the plenary.

Working/Drafting group
Working Group on Marine Biosafety
Working Group on Prevention of Air Pollution from Ships
Working Group on Marine Plastic Litter from Ships
Drafting Group on Carriage of Biofuel Blends by Bunker Ships and on MARPOL Annex I matters
Drafting Group on Revision of MARPOL Annex IV

## Opening

### MV Galaxy Leader

At the opening of the meeting, the Secretary-General informed PPR 11 about the successful release of the 25 members of the crew of the MV Galaxy Leader on 22 January 2025 after their year-long captivity since November 2023.

### Very serious marine casualties in the Kerch Strait

There was intense discussion about the tankers that sank in the Kerch Strait on 15 December 2024, covering the details of the incident, as well as the response and recovery operations. Delegations also debated the seaworthiness of these vessels, with many linking the incident to dark fleet operations.

## Chemicals & biofuel as cargoes

### Updates

Under this agenda item, the routine update of chemical substances is examined for release as MEPC.2 Circular after review by the Technical Group on the Evaluation of Safety and Pollution Hazards of Chemicals (ESPH Working Group).

PPR 11 endorsed the work of ESPH 30 and the MEPC.2/Circ.30 released on 1 December 2024, including:

- The evaluation substances for inclusion in list 1 (Pure or technically pure products and mixtures assessed as a whole);

- The evaluation of trade-named mixtures and their respective inclusion in list 3 (Trade-named) mixtures containing at least 99% by weight of components already assessed by IMO, presenting safety hazards) substances, along with the consequential additions to list 5 (Substances only used as components in trade-named mixtures) substances; and
- The evaluation of cleaning additives.

Another set of updates was tasked to the next ESPH meeting for inclusion into MEPC.2/Circ. 31 for release on 1 December 2025.

During the PPR 12 meeting, updates to the cleaning additives were made and will be circulated as a revision to MEPC.2/Circ.30.

### **Toxic cargoes**

PPR 12 concurred with the amendments to the carriage requirements for 15 existing products listed in chapter 17 of the IBC Code on the basis of SVC/LC50 calculations in accordance with paragraph 21.7.12.5 of the IBC Code and their inclusion in List 1 of MEPC.2/Circ.30 with validity for all countries and with no expiry date.

### **Carriage of biofuel blends by bunker ships**

While the mixture rate of the biofuel has been accepted up to 30 % for onboard fuel use for NOx certification (MEPC.1/Circ.795/Rev.9), carriage as cargo is up to 25% (MEPC.1/Circ.879). This means, supplying 30% biofuel to ships has to be undertaken by MARPOL Annex II (chemical tanker) certified bunkering ships. To address this gap, PPR 11 prepared draft Interim guidance on the carriage of biofuels blends and MARPOL Annex I cargoes by conventional bunker ships for approval by MEPC 83.

The guidelines clarify that conventional bunker ships certificated for carriage of oil fuels under MARPOL Annex I may transport blends of not more than 30% by volume of biofuel to ships, as long as all residues or tank washings are discharged ashore, unless the Oil Discharge Monitoring Equipment (ODME) is approved for the biofuel blend(s) being shipped. No changes to the IOPP certificate would be required in such cases.

## **Persistent floaters**

PPR 12 continued work on amendments to MARPOL Annex II in order to improve the effectiveness of cargo tank stripping, tank washing operations and prewash procedures for products with a high melting point and/or high viscosity, based on the discussion at EPSH 30 and new submission to PPR 12.

Key discussions were:

- Additional cargo tank cleaning equipment: PPR 12 agreed with the conclusion of ESPH 30, i.e. not to require such equipment at this stage as it falls outside of the assigned task; and
- Enhancement of the prewash procedure: While some members supported the enhancements, some expressed concerns about an increase in washing time and temperature, which may negatively impact the ship's fuel consumption and cause damage to equipment and cargo tank coatings. The matter was tasked to the ESPH Working Group for further consideration.

## Biofouling (in-water cleaning)

### Guidance on In-Water Cleaning of Ships' Biofouling

To supplement the *2023 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species* (resolution MEPC.378(80)) (2023 Biofouling Guidelines), PPR 11 worked on in-water cleaning guidelines. The guidance addresses in-water cleaning operations and approval of the In-water cleaning systems (IWCS).

Key discussions at PPR 12 were:

- Testing: PPR 12 inserted reference to ISO 20679:2025 on *Testing of ship biofouling in-water cleaning systems*; however, the Administrations may take into account any other recognized standard(s);
- Post-cleaning inspections: Records, including video, could be kept either on board the ship or by the ship owner or operator;
- Standards for the release of waste substances (capture rate): PPR 12 noting that the expectation of complete capture and/or no impact to the coating was not technologically achievable, agreed that IWCS effluent should not be significantly increased relative to ambient levels;
- Role of ships' crew: PPR 12 agreed to address in-water cleanings conducted by the ship crew using onboard equipment;
- Autonomous system: PPR 12 agreed that cleaning units may be either diver-operated, remotely operated vehicles or fully autonomous systems;

### Additional guidance

PPR 12 agreed that the following matters should be further considered with a view to developing additional guidance in due course:

- Methodology for testing the compatibility between IWCS and various coating types;
- Methods for assessing the minimum performance standard after IWCS enter into service; and
- How to conduct in-water inspections, in connection with chapter 8 of the 2023 Biofouling Guidelines, to determine if in-water cleaning is needed.

## Black carbon

In 2024, the IMO developed the following guidelines:

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

Discussion at PPR 12 focused on "Polar fuel". PPR 12 addressed both marine pollution aspects in the Arctic and the Antarctic required by MARPOL Annex I regulations 43 and 43A and the reduction of the black carbon in the Arctic, which includes mandating distiller fuel in the Arctic. For these reasons, PPR 12 addressed density, viscosity, carbon residue content, cetane index or cetane number, and pour point.

PPR 12 could not conclude the issue and decided to discuss the matter at PPR 13, scheduled for 9–13 February 2026.

### Exhaust gas cleaning system (EGCS) discharge water

#### Further work, including legal framework

IMO adopted *2021 Guidelines for exhaust gas cleaning systems* (resolution MEPC.340(77)) (2021 EGCS Guidelines) to mitigate EGCS discharge risks, and *2022 Guidelines for risk and impact assessments of the discharge water from exhaust gas cleaning systems* (MEPC.1/Circ.899) for the harmonized approach among the IMO Member States.

At PPR 12, while some Members expressed a desire for mandatory discharge restriction, while other Members were of the view that scientific evidence was yet to be provided. In this regard, Liberia informed its research work launched by Massachusetts Institute of Technology (MIT), and Oldendorff Carriers.

PPR 12 agreed to continue the work, and invited Member States and international organizations to submit new concrete proposals to PPR 13 on regulatory measures addressing discharges of EGCS discharge water, reflecting latest available data.

It was confirmed that a global discharge ban on washwater does not fall within the scope of this work.

#### Emission factor

MEPC.1/Circ.899 on *2022 Guidelines for risk and impact assessments of the discharge water from exhaust gas cleaning systems* defines the emission factor as the concentration of the product of individual substance in discharge water from EGCS per the typical flow rate, expressed as mg/MWh". Emission factors are a key input for determining predicted environment concentrations (PECs) used in environmental risk assessments. MEPC 78, having approved the 2022 Risk Assessment Guidelines, had agreed that the Guidelines would be kept under review to allow the consideration of experience gained.

PPR 12 recommended that the Group of Experts on the Scientific Aspects of Marine Environmental Protection (GESAMP) should develop a standard methodology to develop the data sets and calculation of the emission factors, and report on any sets of emission factors determined using the developed methodology. The task includes:

- Evaluate best practices for developing the data sets and method; and
- Evaluate considerations for calculating emission factors.

Following the agreement on the above points, the GESAMP is expected to report any sets of emission factors determined using the methodology developed by the GESAMP Task Team on EGCS.

#### EGCS washwater discharge ban database

The IMO Secretariat is developing a database of local and regional restrictions or conditions on the discharge of water from EGCS. However, PPR 12 noted that no Member States have submitted any information to the IMO Secretariat. Once available, the information will be posted on the IMO website <https://futurefuels.imo.org/>

## Selective Catalytic Reduction (SCR) Systems

PPR 12 continued work to update the 2017 SCR Guidelines to remove ambiguities and ensure consistent application, including clarifying the pre-certification procedure and developing additional guidance for certifying SCR arrangements where more than one engine is connected to a common SCR system. PPR 12 finalized draft 2025 SCR Guidelines for approval by MEPC 83 scheduled for April 2025. The details of the discussion at PPR 12 are given hereunder.

### Connecting more than one engine to a single common SCR

Opinions at PPR 12 were:

- Such arrangements could be considered on a case-by-case basis, and there was no urgent need to develop specific guidance;
- The same level of stringency applied to the certification of a single engine with one SCR system should also be applied to such SCR arrangements.

Following consideration, PPR 12 concluded that there was not sufficient support for developing additional guidance for such SCR arrangements at this stage.

### Reductant control strategies

While there was a proposal to define “feed-forward” and “feedback” in relation to the reductant control strategies to monitor catalyst condition/degradation, PPR 12 did not agree on the need.

### NO<sub>x</sub> measurement device

The frequency of the spot-check was kept current every 12 months. Engine load at the spot check was agreed to be 75% of the applied limited power (not MCR), if any, for the main propulsion engines and 50% for the auxiliary engines.

### Record keeping

PPR 12 clarified the records that should be included for the purpose of maintenance, surveys and inspection.

## Integrated bilge water treatment system (IBTS)

Following Liberia’s co-sponsored proposal to the Marine Environment Protection Committee, the IMO has been working on updates to *the Guidelines for Systems for Handling Oily Wastes in Machinery Spaces of Ships, incorporating guidance notes for an Integrated Bilge Water Treatment System (IBTS)* (draft revised IBTS Guidelines), as well as draft amendments to appendix II (Form of the IOPP Certificate and Supplements) and appendix III (Form of the Oil Record Book) of MARPOL Annex I.

The work was nearly completed in 2020 when PPR 7 drafted the *2020 Guidelines for Systems for Handling Oily Wastes in Machinery Spaces of Ships, incorporating guidance notes for an Integrated Bilge Water Treatment System (IBTS)*. However, the MEPC re-opened discussions on forced evaporation as a method for reducing bilge water.

Liberia, together with an industry member, submitted a proposal for finalization, including an update to the Oil Record Book. However, further discussions were needed on:

- Whether to accommodate forced evaporation under the current regulation 15 of MARPOL Annex I or establish a new dedicated regulation; and
- Revisiting the supplement to the IOPP Certificate (Forms A and B).

Liberia will continue work on this subject toward finalization at PPR 13

## Sewage

### **MARPOL Annex IV and associated instruments**

In 2019, MEPC 74 instructed PPR to include a revision of MARPOL Annex IV and its associated guidelines to introduce provisions for record-keeping and measures to confirm the lifetime performance of sewage treatment plants (STPs), in addition to the ongoing task of revision of type approval guidelines for STPs.

Application issues, in particular, the requirement for performance monitoring devices on existing ships and performance testing during flag State surveys, triggered intense discussions. These issues are associated with the new type-approval standard and performance requirements for newly installed sewage treatment plants (STPs) for which this monitoring device will be required, but retrofitting such devices to existing STPs will be a challenge.

While some Members stressed the importance of implementing these tests to ensure compliance, citing evidence that current STPs do not consistently meet performance requirements when effluents are tested, other Members expressed concerns about the feasibility of implementing such tests on existing STPs. Concerns included the potential need for retrofitting and the incompatibility of some designs with the required modifications.

Additionally, concerns were raised about the retrospective application of new requirements potentially disadvantaging early adopters who had installed STPs based on previous regulations.

The discussions were inconclusive and left for future development of the draft MARPOL regulations.

PPR 12 agreed to establish the correspondence group (CG), which will address the following:

- Further develop the draft revised MARPOL Annex IV with regard to the Sewage Record Book (SRB) and Sewage Management Plan (SMP), and other relevant section;
- Further develop draft amendments to the 2012 Guidelines on implementation of effluent standards and performance tests for sewage treatment plants (Type Approval Guidelines);
- Further develop the draft guidelines on the implementation of MARPOL Annex IV for sewage treatment plants (Implementation Guidelines);
- Develop draft guidance on obtaining data with regard to the quality of treated sewage effluent; and
- If time permits, update the Work plan.

## Plastic litter

### Action plan to address marine plastic litter from ships (Action Plan)

PPR 12 updated the Action Plan (MEPC.310(73)) for adoption by MEPC 83 as the 2025 Action Plan, incorporating recent work on this issue and prioritizing future efforts.

The 2025 Action Plan to Address Marine Plastic Litter from Ships aims to prevent plastic litter from entering the ocean through ship-based activities. It provides a structured approach for identifying specific, measurable actions and outcomes while building on existing policies and regulations. The plan also identifies opportunities to strengthen current frameworks and introduce new measures where needed.

### Plastic pellets

The IMO has developed MEPC.1/Circ.909 on *Recommendations for the carriage of plastic pellets by sea in freight containers (Recommendations)*, and PPR 12 continued its work toward the introduction of a mandatory measure.

PPR 12 developed a table outlining the advantages and limitations of each approach, along with potential impacts such as production practices, supply chains, transport costs, and harmonization of intermodal transport requirements. This table serves to inform future discussions on the most suitable legal framework for introducing mandatory measures, which will be further considered at the next session.

Key challenges in developing mandatory measures are:

- Plastic pellets do not fit in the existing categorization scheme of dangerous goods, as they are not dangerous during transport, neither can be classified within the Globally Harmonized System (GHS) as they have an environmental impact because of their physical characteristics, not because of aquatic toxicity;
- Additionally, using the IMDG Code will require the assignment of a UN number, which must be determined by the UN Sub-Committee of Experts on the Transport of Dangerous Goods (TDG) which lies outside of the remit of the IMO;
- Any measure should assist carriers in developing stowage plans for each voyage;
- Plastic pellets are not garbage but cargo, which makes an inclusion in MARPOL difficult; and
- Containers lost at sea are considered to fall within the definition of a "wreck" under the Nairobi Wreck Removal Convention.

## Any other business

### 2023 Guidelines for the development of the Inventory of Hazardous Materials

PPR 12 finalized the draft amendments to *the 2023 Guidelines for the development of the Inventory of Hazardous Materials and the associated draft MEPC resolution*. The revised text inserted the threshold value for cybutryne as 1,000 mg/kg or 200 mg/kg based on appendix I of *the 2022 Guidelines for survey and certification of anti-fouling systems on ships* (resolution MEPC.358(78)).

Further information

For further information please contact: [imo@liscr.com](mailto:imo@liscr.com)



## Annex

### Provisional list of draft circular/resolution

- Draft further updates to MEPC.2/Circ.30 on Provisional Categorization of Liquid Substances in Accordance with MARPOL Annex II and the IBC Code addressing additional information on cleaning additives.
- Draft Interim Guidance on the carriage of blends of biofuels and MARPOL Annex I cargoes by conventional bunker ships.
- Draft Guidance on the in-water cleaning of ships' biofouling.
- Draft 2025 Guidelines on Selective Catalytic Reduction (SCR) Systems.
- Draft 2025 Action Plan to address marine plastic litter from ships.
- Draft amendments MEPC.379(80) on *2023 Guidelines for the development of the Inventory of Hazardous Materials*, reflecting different cybutryne threshold for wet paints versus hull samples.