

IMO MEPC 83 Meeting Summary

25 April 2025



The 83rd meeting of the Marine Environment Protection Committee (MEPC 83) was held 7-11 April 2025 at the IMO Headquarters in London, supported by hybrid (remote) participation. LISCR participated in the following groups in addition to the plenary.

Group	Subject
Working Group 1	Air pollution and energy efficiency
Working Group 2	Reduction of GHG emissions from ships
Review Group	Ballast water management

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

GHG short-term measures

MEPC 83 addressed 21 challenges identified by the correspondence group (CG).

Annual reduction (Z factor)

MEPC 83 agreed to enhance the Z factor (CII annual reduction target) as a linear reduction, with a 21.5% reduction relative to the 2019 baseline, i.e., 13.626% (2027), 16.250% (2028), 18.875% (2029) and 21.5% (2030). Subsequently, MEPC 83 adopted resolution MEPC.400(83) on Amendments to the 2021 Guidelines on the operational carbon intensity reduction factors relative to reference lines (CII Reduction Factors Guidelines, G3) (resolution MEPC.338(76)).

Year	Reduction factor relative to 2019
2023	5%
2024	7%
2025	9%
2026	11%
2027	13.626%
2028	16.250%
2029	18.875%
2030	21.5%

Correction factors for CII

All pending correction factors (e.g. port waiting time, short voyages) were deferred to phase 2 (2026–2028) discussions. One important direction is to focus on voyage-only emissions (i.e. excluding port operation emissions from CII), referred to as the “sea voyage-propulsion based CII metric”, which will be addressed during the phase 2 discussions.

SEEMP Guidelines

MEPC 83 clarified the terminology “hours underway” and replaced “boiler” with “fired boiler”. Subsequently, MEPC 83 adopted resolution MEPC.401(83) on *Amendments to the 2024 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP) (resolution MEPC.395(82))*.

EEDI calculation – sea trial

MEPC 83 agreed to refer to both the 2025 version of the ISO standard and the ITTC Recommended Procedure in the EEDI survey and certification guidelines. To ensure a smooth transition, MEPC 83 endorsed the continued use of ISO 15016:2015 for ships whose sea trials are conducted before 1 May 2026. MEPC 83 also invited ITTC to keep the IMO informed of any updates to its Recommended Procedure.

MEPC 83 adopted resolution MEPC.403(83) on *Amendments to the 2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI)*.

GHG Mid-term measures**Draft amendments to MARPOL Annex VI**

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.

MEPC 83, following intense discussions at two intersessional working group meetings (ISWG-GHG 18 and ISWG-GHG 19), approved by majority vote the new MARPOL Annex VI Chapter 5 on mid-term GHG measures.

However, it should be noted that this vote was taken only by delegates who had submitted valid credentials to the MEPC 83 meeting, and that approval at this stage does not constitute a formal decision-making process under Article 16 of the MARPOL Convention.

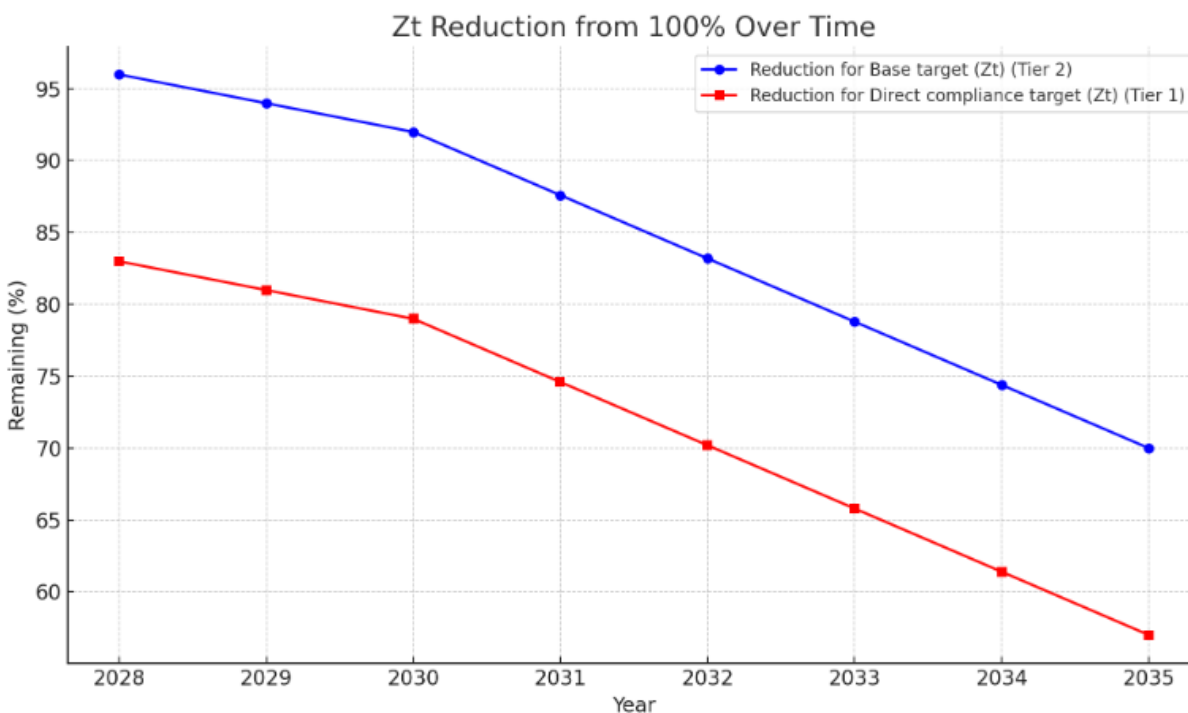
The draft text is expected to be adopted at the Second Extraordinary Session of the Marine Environment Protection Committee (MEPC ES.2), scheduled for October 2025, with entry into force on 1 March 2027. If a vote is required, it will follow the procedure set out in Article 16 of the MARPOL Convention, requiring a two-thirds majority of Parties to Annex VI.

In the meantime, the existing Chapter 5 on the IMO Member State Audit Scheme will be renumbered as Chapter 6.

Key elements of the new chapter 5 include:

- Application: The new mid-term measures apply to:
 - All ships of 5,000 gross tonnage and above engaged on international voyages;
- And do not apply to:
 - Ships not propelled by mechanical means, and platforms including FPSOs, FSUs, and drilling rigs, regardless of their propulsion method; and
 - Semi-submersible vessels.
- Fuel GHG Intensity Requirements: Ships are required to use fuels with low carbon content, with progressively tightened limits over the years:

- The carbon intensity of the fuel is measured on a Well-to-Wake (WtW) basis, i.e. including upstream GHG emissions from fuel production and those during transportation. This principle also applies to shore power supply (cold ironing). If the source of the electricity is fossil-based, it will be accounted for in the ship's GHG emissions; and
- The GHG intensity is to be calculated and certified by a recognized verifier, and presented in the Bunker Delivery Note as the Fuel Lifecycle Label (FLL).
- Two-tier compliance: The requirements consist of two tiers (base figure is 93.3 gCO₂eq/MJ):
 - Base Tier (basic contribution) (Tier 2);
 - Direct Compliance (Tier 1);



Ships not reaching the required target must purchase remedial units (depending on the rating, that could be the sum of both two tiers) or alternatively for Tier 2 deficit used surplus units banked from previous two years and/or purchase surplus units from other ships, while ships exceeding the target may:

- Retain the excess (surplus units) for use in future years (two years); or
- Exchange them with other ships within the same group (compliance pool for Tier 2).

For the reporting periods 2028 to 2030, the initial price of a Tier 1 remedial unit shall be USD 100 per tonne of CO₂eq on a well-to-wake basis, and the initial price of a Tier 2 remedial unit shall be USD 380 per tonne of CO₂eq on a well-to-wake basis. The price of the Tier 1 and Tier 2 remedial unit for the reporting periods from 2031 and onwards, will be determined by 1 January 2028.

- Update of the Ship Energy Efficiency Management Plan (SEEMP): Ships are required to update and obtain approval of their SEEMP by the flag Administration before 1 January 2028, taking into account guidelines currently under development.

- Statement of Compliance (SOC): Ships must be provided with a Statement of Compliance (SOC) certifying compliance on or before 30 September each year.
- Annual GFI reduction factors (in percentage) for the target annual GFI relative to the GFI reference value equivalent to 93.3 gCO₂eq/MJ (well-to-wake) are:

Year _T	Z _T for Base target	Z _T for Direct compliance target
2028	4.0%	17.0%
2029	6.0%	19.0%
2030	8.0%	21.0%
2031	12.4%	25.4%
2032	16.8%	29.8%
2033	21.2%	34.2%
2034	25.6%	38.6%
2035	30.0%	43.0%

Target reduction after 2035 will be decided by 2032.

- ZNZs includes technologies, fuels and energy sources and are to be evaluated on a well-to-wake basis, taking into account guidelines to be developed by the IMO. The GFI threshold for ZNZs will be set at not greater than 19.0 gCO₂eq/MJ for an initial period until 31 December 2035, and from 1 January 2036, the threshold will be set at not greater than 14.0 gCO₂eq/MJ.

Associated guidelines

MEPC 83 identified 10 new supporting guidelines and 4 existing guidelines that require amendments. MEPC 83 requested the Secretariat to prepare a draft work plan toward the entry into force of the IMO net-zero framework, for consideration by MEPC/ES.2.

Methane (CH₄) and/or nitrous oxide (N₂O) emissions

The GHG mid-term measures address not only CO₂ but also methane (CH₄) and/or nitrous oxide (N₂O) emissions. Following discussions in the Correspondence Group (CG) and the EEAP Working Group, MEPC 83 adopted resolution MEPC.402(83) on *Guidelines for test-bed and onboard measurements of methane (CH₄) and/or nitrous oxide (N₂O) emissions from marine diesel engines*.

The Correspondence Group will continue to work on the framework for measurement and verification.

Life Cycle GHG Assessment (LCA) framework

Life Cycle Assessment (LCA) defines the carbon content of fuel across its full lifecycle, i.e., from production and transport to onboard use, under the “well-to-wake” (WtW) approach. The IMO adopted the *2024 Guidelines on the Life-Cycle GHG Intensity of Marine Fuels (2024 LCA Guidelines)* (resolution MEPC.391(81)), and updates are underway to include sustainability criteria aimed at reducing social impacts from carbon-neutral fuel production.

All LCA-related matters are currently handled by the Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection – Life Cycle Assessment Working Group (GESAMP-LCA Working Group), ahead of consideration at MEPC 84 (provisionally, 20–24 April 2026).

MEPC 83 noted GESAMP-LCA WG's review of WtT and TtW default GHG emission factors for fuel production and onboard technologies, and approved MEPC.1/Circ.916 on *the methodology for submission, review, and recommendation of proposed default emission factors by GESAMP-LCA WG*. MEPC 83 also noted the development of an Excel tool by GESAMP-LCA WG to standardize the reporting and calculation of proposed default emission factors, based on the 2024 LCA Guidelines. The editable file will be made available on the IMO website.

IMO GHG study

The IMO GHG Study investigates greenhouse gas (GHG) emissions from ships and may inform the review of the next IMO GHG Strategy in 2028. The IMO Secretariat has been tasked with developing a supporting work plan. Several proposals were submitted to MEPC 83, including one on fugitive methane emissions from the supply chain, which will be discussed at the next ISWG-GHG, scheduled for the week following MEPC ES.2.

Onboard carbon capture and Storage (OCCS)

The work is still in its early stages, and MEPC 83 merely approved the work plan for the development of a regulatory framework for the use of onboard carbon capture and storage (OCCS). The expected completion of the work is in 2028. Consideration as part of mid-term and short-term measures has not yet started. The work will continue under the Correspondence Group (CG).

DCS data accessibility

MEPC 83 agreed to:

- Grant full access to un-anonymized data to the flag Administration;
- Grant access to anonymized data to the public; and
- Grant access to un-anonymized data to the company.

Subsequently, MEPC 83 approved draft amendments to regulation 27 of MARPOL Annex VI on IMO DCS accessibility, for adoption by the second extraordinary session of the Marine Environment Protection Committee (MEPC ES.2), scheduled for October 2025.

SOx Control

EGCS wash water discharge

The PPR Sub-Committee is working on the introduction of mandatory measures for the control of EGCS washwater discharge under MARPOL regulations. A submission to MEPC 83 raised concerns regarding air pollution, in addition to marine pollution caused by washwater discharge, for example, an increase in PM emissions.

MEPC 83 forwarded the relevant submission to PPR 13 for further consideration.

NOx control

Multiple engine operational profiles

MEPC 83 adopted amendments to the NOx technical code (MEPC.397(83)). While the amendments are expected to enter into force on 1 March 2027, it applies as follows:

- (a) For a new individual engine or a parent engine of an engine family or engine group that has not been previously certified, the said amendments apply no later than 1 January 2028, based on the issue date of the EIAPP Certificate for the individual engine or parent engine;
- (b) In the case of a new member engine to an engine family or engine group for which the parent engine was certified before 1 January 2028, prior to the certification of that member engine it would need to be shown that the engine family or engine group complied with the said amendments no later than 1 January 2030 based on the issue date of the EIAPP Certificate for that member engine;
- (c) The said amendments do not apply to a marine diesel engine which already has an EIAPP Certificate except:
 - (i) in the case of an engine that is subject to substantial modification on or after 1 January 2028, the said amendments would apply as specified in the definitions of "substantial modification" set out in amended paragraph 1.3.2 of the NOx Technical Code 2008 based on the issue date of the EIAPP Certificate for that engine;
 - (ii) in the case of an identical replacement engine installed on or after 1 January 2028, the version of the NOx Technical Code 2008 at the time of issuance of the EIAPP Certificate to the original engine applies, unless the replaced engine is already equipped with multiple engine operational profiles, in which case the provisions of the new chapter 8 of the NOx Technical Code 2008 apply;

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 83 adopted amendments to the NOx technical code (MEPC.398(83)). The amendments are expected to enter into force on 1 September 2026. MEPC 83 encouraged Member States to apply the amendments as soon as possible.

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.

SCR guidelines

MEPC 83 adopted resolution MEPC.399(83) on *2025 Guidelines on Selective Catalytic Reduction (SCR) systems*. Key features of the guidelines are:

- NOx 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: The guidelines clarified the records that should be included for the purpose of maintenance, surveys and inspection.

Special areas

North-East Atlantic Ocean

MEPC 83 approved the proposal to designate the North-East Atlantic Ocean as an Emission Control Area (ECA) for sulphur oxides (SO_x), particulate matter (PM), and nitrogen oxides (NO_x), pursuant to regulations 13 and 14 and appendix III of MARPOL Annex VI. The final adoption is scheduled for MEPC ES.2 in October 2025. The expected entry into force date is 1 January 2027. "Ship constructed on or after 1 January 2027" means a ship:

- for which the building contract is placed on or after 1 January 2027; or
 - in the absence of a building contract, the keels of which are laid or which are at the similar stage of construction on or after 1 July 2027; or
 - the delivery of which on or after 1 January 2031.
- SO_x control (use of 0.10% sulphur fuel) has a period of grace until 1 January 2028.

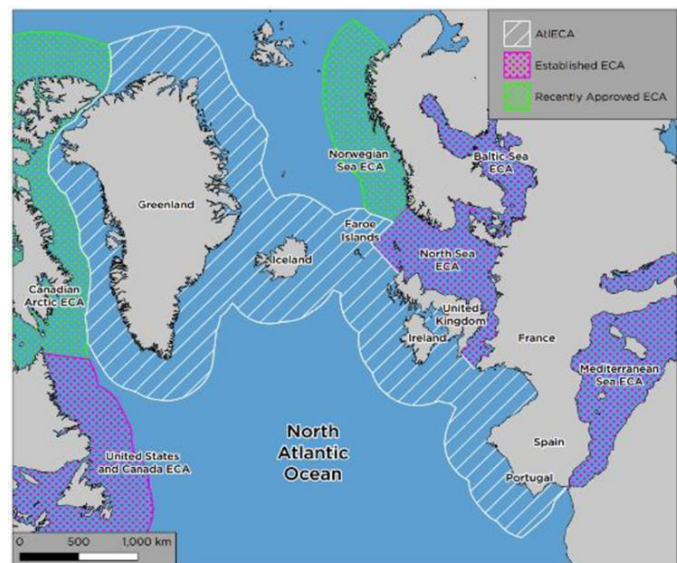


Figure 1: Proposed North-East Atlantic Emission Control Area alongside the other established and proposed ECAs

Figures from proposal (MEPC 83/12)

Ballast water management and Bio Fouling

Comprehensive review of the BWM Convention (BWMC)

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, analysis, and the convention review are completed.

MEPC 83 continued work on 86 identified objectives, which represent regulatory gaps. The target is to complete work on the mandatory instruments, namely the BWM Convention and the BWM Code, at MEPC 84 (scheduled for April /May 2026). The development of associated guidelines may continue up to the entry into force date. Key discussions include:

- BWMS testing parameters and test conditions: MEPC 83 did not agree to optional enhancements but decided to introduce additional testing.
- Port State Control: There was intense discussion on the introduction of a "risk-based" targeted inspection approach. While the BWRG agreed to retain the principle of "clear grounds," many members supported the idea of a more targeted inspection strategy.
- Training and Familiarization: It was agreed to enhance familiarization requirements by amending regulation B-6. The BWRG recognised that making reference to the STCW Convention could result in manning problems similar to those seen with LNG training.

- **Obsolete regulations:** There was intense discussion on regulation D-1. While some Members consider the regulation obsolete, others believe it should be retained to address contingency situations.

Disinfection by-products (DBPs)

Continued from MEPC 82 in 2024, some submissions indicated increased discharge of disinfection by-products (DBPs), particularly from filterless BWMS. MEPC 83 agreed to continue reviewing the issue.

Exemption

Concerns were expressed that the exemption granted under Regulation A-4 did not follow the intention of the regulation or *Guidelines for Risk Assessment under Regulation A-4 of the BWM Convention (G7)*. MEPC 83 invited interested Member States and international organizations to submit concrete proposals to a future session.

Challenging water quality

MEPC 83 continued to address operational challenges and implications for ships operating in challenging water quality conditions.

Pre-emptive bypass agreements

MEPC 83 invited Member States to nominate contact points for such agreements in port/coastal States. The information, once collated, would be posted on IMO's website (<https://www.imo.org/en/OurWork/Environment/Pages/BWMConventionandGuidelines.aspx>)

Type-approval

MEPC 83 granted approval in accordance with *Procedure for approval of ballast water management systems that make use of Active Substances (G9)* (resolution 169(57)) as follows:

Basic approval

- Blue Ocean Shield Electrolytic Chlorination (EC) BWMS

Final Approval

- ERMA FIRST FLOW® BWMS
- OceanGuard® Sim BWMS

Type approval by the flag Administration

MEPC 82 also noted the information provided on BSKYTM Ballast Water Management System (China).

Future approval

MEPC 83 noted the requests of the GESAMP that not submit a BWMS for Basic Approval if it was still under development (referring to paragraph 8.1.2.2 of Procedure (G9)).

Guidance on in-water cleaning of ships' biofouling

MEPC 83 approved MEPC.1/Circ.917 on *Guidance on in-water cleaning of ships' biofouling* developed by PPR 12. The key elements of the Guidance are:

- 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 in-water cleaning systems (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; and
- Autonomous system: PPR 12 agreed that cleaning units may be either diver-operated, remotely operated vehicles or fully autonomous systems.

Plastic litters

Action Plan to address marine plastic litter from ships

MEPC 83 adopted resolution MEPC.404(83) on *2025 Action Plan to Address Marine Plastic Litter from Ships* (2025 Action Plan).

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.

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.

MEPC 83 noted that PPR 12 continued to work on mandatory measures and compiled a table of considerations, advantages, limitations and impacts relating to amendments to mandatory instruments.

Regarding the ongoing work on plastic pellets, several delegations stressed the urgent need to continue developing mandatory measures for their carriage in freight containers, especially in light of a recent allision off the UK coast involving two vessels, which led to plastic pellets being released into the sea and washing up on North Sea coastlines.

Underwater noise

Several documents, opinions, and information on various research and workshops were submitted, expressing concerns about the increase in underwater noise and possible reduction methods. These were referred to the SDC Sub-Committee for their review and consideration.

Special areas

Nasca Ridge National Reserve and the Grau Tropical Sea National Reserve

MEPC 83 agreed in principle to the designation of the two National Reserves as PSSAs, subject to the further development and approval of the proposed associated protective measures.

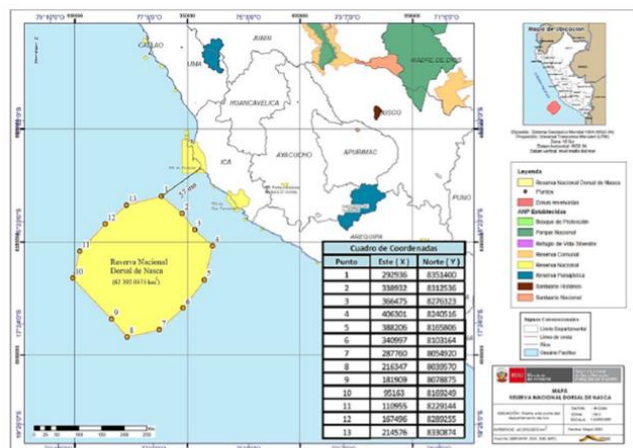


Figure 1. Map showing the location of the proposed PSSA

Chart from proposal (MEPC 83/12/1)



Figure 1. Map showing the location of the FOUR (4) sectors comprising the proposed PSSA

Chart from proposal (MEPC 83/12/2)

Oil and Chemicals

Carriage of chemicals in bulk

MEPC 83 endorsed MEPC.2/Circ.30/Rev.1 on *Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code*, which took effect on 1 January 2025.

Carriage of biofuel blends by bunker ships

MEPC 83 approved MEPC.1/Circ.917 on *Interim guidance on the carriage of blends of biofuels and MARPOL Annex I cargoes by conventional 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 12 prepared draft Interim guidance on the carriage of biofuel 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.

Others

Inventory of Hazardous Materials

MEPC 83 adopted resolution MEPC.405(83) on *Amendment to the 2023 Guidelines for the development of the Inventory of Hazardous Materials (resolution MEPC.379(80))*. 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)).

Hong Kong Convention vs Basel Convention

There was uncertainty regarding the status of the Hong Kong Ship Recycling Convention, as the Parties to the Basel Convention have not yet decided whether the Hong Kong Convention is equivalent to the Basel Convention.

MEPC 83 noted that the IMO Secretariat had submitted a document outlining the progress of work at the IMO. The matter was left to each Party to act in accordance with *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) (Provisional Guidance)*.

MEPC 83 instructed the IMO Secretariat to strengthen liaison with the Basel Convention Secretariat and to monitor discussions at the Conference of the Parties scheduled for April to May 2025.

Assessment of the implementation of the Hong Kong Ship Recycling Convention (HKSRC) through an experience-building phase and development of amendments and clarifications as appropriate

MEPC 83 approved the new work on the review of the HKSRC with four sessions needed to complete the item under the “post biennium “ (waiting list) of the PPR Sub-Committee.

Environmental impact caused by allision between two ships off the Eastern coast of the United Kingdom

MEPC 83 was informed of the details of the incident that occurred off East Yorkshire on the north-east coast of the United Kingdom on 10 March 2025, along with the subsequent rescue and fire-fighting operations, as well as the damage assessment and pollution response.

Very serious marine casualties in the Kerch Strait

MEPC 83 noted information on the two very serious marine casualties in the Kerch Strait on 15 December 2024.

Further information

For further information please contact: imo@lisrcr.com

Annex

Provisional list of approved/adopted circular/resolution

ID	Title
MEPC.397(83)	Amendments to the No _x Technical Code 2008 (Use of multiple engine operational profiles for a marine diesel engine, including clarifying engine test cycles)
MEPC.398(83)	Amendments to the NO _x Technical Code 2008 (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)
MEPC.399(83)	2025 Guidelines on Selective Catalytic Reduction (SCR) systems
MEPC.400(83)	Amendments to the 2021 Guidelines on the operational carbon intensity reduction factors relative to reference lines (CII reduction factors guidelines, G3) (resolution MEPC.338(76))
MEPC.401(83)	Amendments to the 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP) (resolution MEPC.395(82))
MEPC.402(83)	Guidelines for test-bed and onboard measurements of methane (CH ₄) and/or nitrous oxide (N ₂ O) emissions from marine diesel engines
MEPC.403(83)	Amendments to the 2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI)
MEPC.404(83)	Action Plan to Address Marine Plastic Litter from Ships (2025 Action Plan)
MEPC.405(83)	Amendment to the 2023 Guidelines for the development of the Inventory of Hazardous Materials (resolution MEPC.379(80))
MEPC.1/Circ.916	Methodology for submission, scientific review and recommendation of proposed default emission factors by GESAMP-LCA WG
MEPC.1/Circ.917	Interim guidance on the carriage of blends of biofuels and MARPOL Annex I cargoes by conventional bunker ship
MEPC.1/Circ.918	Guidance on in-water cleaning of ships' biofouling
MEPC.1/Circ.919	Rules of Procedure of the Marine Environment Protection Committee
MEPC.2/Circ.30/Rev.1	Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code