



İstanbul :

Sayı:

Our Reference : 3957

Konu:

Subject : ICS'in Çevre Alt Komitesi Toplantısı Taslak Tutanakları Hk.

18.10.2018

Sirküler No: 594 / 2018

Sayın Üyemiz,

İlgi: Uluslararası Deniz Ticaret Odası(ICS)'nin 15.10.2018 tarihli ve ENV18(13) sayılı yazısı ve Eki

İlgi yazı ile;

ICS Üyelerinin, Çevre Alt Komitesi'nin 2 Ekim 2018 tarihli toplantısına ilişkin taslak tutanakları incelemeleri ve ICS Sekreteryasına görüş bildirmeleri talep edilmektedir.

Konu ile ilgili varsa görüş ve önerilerinizin erkin.tugran@denizticaretodasi.org.tr adresine gönderilmesini, bilgilerinize arz ve rica ederiz.

Saygılarımızla,

Cengiz ÖZKAN
Genel Sekreter V.

EKLER:

Ek-1: İlgi yazı ve Eki (16 syf.)

DAĞITIM:

Gereği:

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- Vapur Donatanları ve Acenteleri Derneği
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15 October 2018

ENV(18)13

To: ENVIRONMENT SUB-COMMITTEE

Copy: All Full and Associate Members (for information)

**DRAFT MINUTES OF THE ENVIRONMENT SUB-COMMITTEE MEETING
(2 OCTOBER 2018)**

Action required: Members are invited to review the draft minutes of the Environment Sub-Committee's most recent meeting (2 October 2018) and provide comments to the Secretary as appropriate.

Minutes of the most recent meeting of the Environment Sub-Committee (2 October 2018) are provided at **Annex A**. An Attendance List is provided at **Annex B**.

Members are invited to review the draft minutes and provide comments to the undersigned (john.stawpert@ics-shipping.org) as appropriate.

John Stawpert
Manager (Environment and Trade)

INTERNATIONAL CHAMBER OF SHIPPING

Environment Sub-Committee

Held on 2 October 2018 at 10:00

38 St Mary Axe, London

Minutes

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1) Introduction

The Chairman welcomed the attending members to the meeting.

2) Minutes of the Previous Meeting

The Sub-Committee approved the minutes of the previous meeting.

3) Noise from Commercial Shipping

The Sub-Committee recalled its previous consideration of paper MEPC 72/16/5 (Canada), and noted that Canada and New Zealand had made a further submission to MEPC 73, which does not request a new output, but builds on the previous submission, focusing on design and technology, rather than operational measures, and highlights specific knowledge gaps which need to be addressed before work by IMO can progress.

The Secretariat proposed an outline position on underwater noise:

- Primacy should be given to mandatory design measures for new-builds based on MEPC.1/Circ.833 and informed by scientific data, reflecting a necessary, proportionate and achievable reductions in underwater noise;
- If proposed, retrofit requirements for existing ships should be carefully considered. In particular, no measures which do not have demonstrable co-benefits for energy efficiency should be considered; and
- Operational measures (speed reductions and re-routeing) should be based on the principle of optimisation. One size-fits-all approaches should be avoided.

Consideration was given to whether this could form the basis of a formal position paper on underwater noise.

The Sub-Committee also considered whether the potential significance of noise as an IMO agenda item would warrant ICS commissioning independent research in order to further inform its position on the issue. It was noted that Canada would host an international workshop on ship design and technology at IMO from 30 January to 1 February 2019.

The Sub-Committee fully acknowledged the seriousness of the issue of noise from commercial shipping. It was reported that the retrofitting of Maersk vessels had resulted in a significant reduction in noise and that there were therefore technical options available to combat the problem, without resorting to slow steaming as was favoured by many NGOs and certain States. It was further noted that the application of SEMP had contributed to reductions in noise since the issue of underwater noise was first raised. The Sub-Committee considered that a presentation by the German expert who had conducted much of the research into underwater noise could be beneficial.

In conclusion, the Sub-Committee:

- **Noted the information provided;**
- **Endorsed the outline position on underwater noise,**
- **Did not consider the a formal position paper necessary at the present time, believing this proposal could be revisited following the workshop at IMO in January 2019; and**
- **Noting that sufficient research already existed, did not believe it was necessary for ICS to commission independent research into underwater noise generated by commercial shipping.**

4) Hull Biofouling

The Secretariat advised the Sub-Committee of progress made in the development of an Underwater Cleaning Standard coordinated by BIMCO, and it was noted that the standard would be tested prior to launch, with an ultimate aim of sending the standard to the International Maritime Organization (IMO) and/or International Organization for Standardization (ISO) for international approval and recognition. The Chairman advised the Sub-Committee that the Californian State Land Commission regulation on Hull Biofouling had been effective since 1 January 2018 and that useful resources with respect to compliance could be found at:

www.slc.ca.gov/programs/misp.html .

It was noted that an alignment of the various regional and local standards would be to the benefit of industry. Furthermore, the Sub-Committee noted that the application of the European Biocide Regulation conflicted with the ambitions to minimize hull biofouling through cleaning, since many biocide free coatings were removed in the process. The Sub-Committee noted the general conflict between various regulations and instruments in this regard, with regulations preventing harm in one area particular creating a situation that facilitated it in another.

The Sub-Committee supported the ongoing engagement on the standard, coordinated by BIMCO and encouraged the Secretariat to engage with the issue at the IMO. The Secretariat was also encouraged to make contact with New Zealand at MEPC to discuss problems arising from the application of

“long stay” requirements to ships calling at ports that were not approved under their regulation.

5) Marine Plastic Litter

The Sub-Committee was briefed on papers submitted to MEPC 73 under agenda Item 8 – Development of an Action Plan to Address Marine Plastic Litter from Ships and consideration was given to a number of proposals made across them.

In conclusion, the Sub-Committee:

- **Agreed that a study on marine plastic litter from ships, including fishing vessels by IMO would be beneficial and, that this should provide a scientific justification for further work;**
- **Agreed that the solution needed to be holistic and representative of the flow of plastic waste to and from vessels, recognising the importance of the provision of adequate port reception facilities in accordance with MARPOL Annex V;**
- **Agreed that mandating of garbage record books for ships above 100GT would have a positive impact on reducing marine plastic litter;**
- **Agreed that a review of the Model Course “Marine Environmental Awareness 1.38” could be beneficial;**
- **Believed that there could be value in establishing a compulsory system for declaring and reporting the loss of containers, provided the issue was predominantly handled by CCC and MSC as the appropriate IMO bodies. There was no support for the use of tracking devices for the reasons laid out in the BIMCO and WSC submission;**
- **Did not support proposals for mandatory 100% indirect fee systems or mandatory requirements for discharge, which would take away the ability of ships and companies to manage onboard wastes in accordance with MARPOL Annex V;**
- **Reducing marine microplastic litter from shipping including, wear from ships hulls and, grey water would need serious consideration and a recognition that the solutions would more likely lie with more stringent controls ashore, in particular given that land-based sewage treatment was currently unable to prevent the pollution by marine microplastics.**
- **Agreed that ICS should promote the positive story about the control of plastic waste onboard ships to the wider public, who mistakenly assume that sea-borne litter derived from a maritime rather than land based source.**

The Secretariat was instructed to forward the decision of the Sub-Committee to the Marine Committee for endorsement and, pursuant to that decision, to use the decisions as the basis for the ICS position at MEPC 73.

6) Ballast Water Management

a) Ballast Water Management Convention Developments

i) BWM Convention update

The Subcommittee noted that the International Ballast Water Management Convention entered into force on 8 September 2017 and as of the 26 July 2018, with Serbia being the latest to accede, a total of seventy-four countries have now ratified the Convention representing more than 75% of the world's merchant fleet tonnage.

ii) New Provision in the HSSC Survey Guidelines on validating the compliance of individual BWMS with regulation D-2 of the BWM Convention in conjunction with their commissioning during the initial survey (survey item (BI) 1.1.2.19).

It was recalled that the Marine Committee previously agreed that the ICS position at MEPC 72 should be that the efficacy test related to the installation and commissioning of BWMSs should be mandatory and that, subsequently, MEPC 72 agreed that the survey item should be considered mandatory and that the guidance called for in survey item (BI) 1.1.2.19 of the 2017 HSSC Guidelines is required. However it was noted that Japan had submitted MEPC 73/4/5, commenting on the decision at MEPC 72 and, proposing that the mandatory verification of BWMS efficacy associated with commissioning be held in abeyance "until data and experience have been gained and reliable sampling methods and procedures have been established through the EBP.

The Sub-Committee considered the proposal of Japan, and in particular whether definitive testing offered a safeguard to the shipowner, in particular in the context of port State Control inspections of the BWMS at the first port of call following delivery. Although some members felt that the efficacy test was a commercial matter to be agreed contractually between the shipowner and BWMS supplier, and, the majority of members felt that it would be considered a grandfathering clause for compliance, others felt that such a test conducted by the shipyard would have value. Furthermore, it was noted that the data produced by such tests would be beneficial in the context of the Experience Building Phase (EBP). It was further noted that indicative testing was distinct from type approval and, that mandating the requirement would protect smaller owners who did not have the capacity to negotiate favourably with manufacturers.

In conclusion, the Sub-Committee reconfirmed the view that basic efficacy test consisting of indicative sampling and analysis should be successfully completed prior to issuance of the IBWMC as part of the Initial Survey.

iii) New Work output on efficient identification and enhancement of safety, technical, operational and documentation review and amendment for improvement and consistent implementation of the Ballast Water Management Convention.

Members were advised that ICS had cosponsored submission MEPC 73/15, which proposes a new work output in relation to the "Efficient identification and enhancement of safety, technical, operational and documentation review and amendment for improvement and consistent implementation of the Ballast Water Management Convention".

The Sub-Committee noted the information provided and, were urged to encourage their respective national Administrations to support the new proposed work output and particularly the incorporation of the proposed agenda item detailed in paragraph 17.3.

iv) Experience Building Phase associated with the BWM Convention.

Members noted that MEPC 72 approved the draft BWM.2 circular on the data gathering and analysis plan for the experience-building phase (set out in annex 2 to MEPC 72/WP.9 and now circulated as BWM.2/Circ.67). It was noted that the timeline for the EBP is provided in paragraph 6.2 and a summary in tabular form is provided as follows:

| MEPC session | Timing | Milestone | EBP / MEPC action |
|--------------|-------------|--|---|
| 73 | Autumn 2018 | Convention has been in force one year | |
| 74 | Spring 2019 | | First year of data available |
| 75 | Spring 2020 | Convention has been in force two years | Second year of data available, stocktaking of EBP timeline |
| 76 | Autumn 2020 | Convention has been in force three years | Partial third year of data available, enough to agree to data analysis report terms of reference. |
| 77 | Spring 2021 | | Full third year of data available, Draft analysis report received. |
| 78 | Spring 2022 | Convention has been in force four years | Final analysis report received. Convention issues agreed. |
| 79 | Autumn 2022 | Convention has been in force five years | Package of amendments submitted to the Parties. |

The Sub-Committee noted that the first year of data will not be made available until MEPC 74 which will take place in spring 2019 and, noted the information provided in general.

b) United States Ballast Water Regulation Developments

The Sub-Committee noted that the USCG had granted full USCG approval to 10 systems:

| Manufacturer | Model | System Type | Approved Range (m³/h) | Certificate Issued* (Amended) |
|-----------------------------------|------------------|---------------------------------|---|--------------------------------------|
| Optimarin AS | OBS/OBS Ex | Filtration + UV | 167 – 3,000 | 2 Dec 2016 (3 Nov 2017) |
| Alfa Laval Tumba AB | Pure Ballast 3 | Filtration + UV | 150 – 3,000 | 23 Dec 2016 (21 Dec 2017) |
| TeamTec OceanSaver AS | OceanSaver MK II | Filtration + Electrolysis | 200 – 7,200 | 23 Dec 2016 (18 Oct 2017) |
| Sunrui | BalClor | Filtration + Electrolysis | 50 – 8,500 | 06 Jun 2017 (5 Jan 2018) |
| Ecochlor, Inc. | Ecochlor BWTS | Filtration + Chemical Injection | 500-16,200 | 10 Aug 2017 (26 Apr 2018) |
| Erma First | Erma First FIT | Filtration + Electrolysis | 100 – 3,740 | 18 Oct 2017 |
| Techcross, Inc. | Electro-Clean | Electrolysis | 150-12,000 | 5 Jun 2018 |
| Samsung Heavy Industries Co., Ltd | Purimar | Filtration + Electrolysis | 250-10,000 | 15 Jun 2018 (20 Jul 2018) |
| BIO-UV Group | BIO-SEA B | Filtration + UV | 55-1,400 | 20 Jun 2018 |
| Wartsila Water Systems Ltd. | Aquarius EC | Filtration + Electrolysis | 250-4,000 | 30 Aug 2018 |

* Some manufacturers have requested multiple amendments to their Type Approval Certificates. The date not in brackets is the date the original approval certificate was issued by the USCG, the date in brackets is the date of the current amended certificate. Copies of the Coast Guard Type Approval Certificates can be found on the USCG Approved Equipment List at:

<http://cgmix.uscg.mil/Equipment/Default.aspx> .

In addition to the 10 approved systems above 7 further systems, as follows, are currently being reviewed for approval:

| Manufacturer | Model | System Type | Approved Range (m³/h) | Date Approved |
|----------------------------|--------------|---------------------------|---|----------------------|
| De Nora Water Technologies | BALPURE | Filtration + Electrolysis | 400-7,500 | Pending |

| | | | | |
|----------------------------------|----------------------|--------------------------------|-----------|---------|
| JFE Engineering Corporation | BallastAce | Filtration + Chemical Dosing | 500-3,500 | Pending |
| Panasia Co.,Ltd. | GloEn-Patrol | Filtration + UV | 50-6,000 | Pending |
| Headway Technology Co.,Ltd | OceanGuard | Filtration + Electrolysis | 65-5,200 | Pending |
| Hyundai Heavy Industries Co.,Ltd | HiBallast | Filtration + Electrolysis | 75-10,000 | Pending |
| Envirocleanse, LLC | inTank | Electrolysis + Chemical Dosing | 0-120,000 | Pending |
| NK BMS Co.,Ltd. | NK-O3 BlueBallast II | Ozone generation & Injection | 200-8,000 | Pending |

The Chairman advised the Sub-Committee that the US Coast Guard was tightening the timeframe and requirements for extensions and, reducing the permitted extension period and, furthermore, that slippage in the timing of dry-docking would see owners miss out on extensions that had already been permitted.

The Sub-Committee noted the information provided and, that CSA was attempting to resolve the issue with the USCG at the highest level.

7) Air Emissions

a) Global Sulphur Cap

i. IMO Developments

The Sub-Committee was advised that the IMO Intersessional Working Group on Air Pollution (ISWG-AP1) was held from 9 to 13 July 2018 and that a detailed report of this meeting can be found in MC(18)58. The salient outcomes of the Meeting were summarised by the Secretariat:

The Sub-Committee noted the information provided, recognising that the ICS Board had directed the Marine Committee to consider the Global Sulphur Cap in depth.

ii. RMI Submission to MEPC 73 entitled “Safety implications and respective challenges associated with 2020 compliant fuels”

Members of the Sub Committee were informed that the Republic of Marshall Islands (RMI) submitted the document MEPC 73/5/14 titled “Safety implications and respective challenges associated with 2020 compliant fuels” to MEPC 73, which in its final form proposes an Experience Building Period in relation to the introduction of the 2020 Global Sulphur Cap. Members were also informed that ICS was not able to obtain a consensus from members to co-sponsor the initial or final versions of the submission.

The Sub-Committee noted that the submission was discussed at the last meeting of the ICS Board on 11 September and, that the Marine Committee would deliberate on a suitable intervention to be delivered at MEPC 73

iii. Industry guidance on compliance:

The Sub-Committee was advised that, in response to the agreement to prepare and issue guidance for shipping companies on preparatory and transitional issues, ICS had developed, with the assistance of a number of shipping companies, "Provisional Guidance to Shipping Companies and Crews on Preparing for Compliance with the 2020 Global Sulphur Cap for Ships' Fuel Oil". It was noted that the Secretariat anticipated that the free Guidance might need to be updated in due course to take account of any further developments at IMO, as well as guidance developed by other stakeholders. Taking into account the decision made by the ICS Board held on 11 September 2018, the Sub-Committee noted that the ICS Guidance had been published and is available at the following link on the ICS website:

<https://bit.ly/2x7B7tC>

In considering the guidance, concern was expressed that certain sections of the guidance moved liability from the bunker suppliers to the shipowner and that this would be particularly damaging in the context of bulk tramp shipping. However, other members of the Sub-Committee expressed support for the guidance document which was felt to represent best practice at the current time.

With regards to ICS participation in the separate work being carried out by the joint industry group co-ordinated by OCIMF and IPIECA to develop guidance on potential safety and operational issues related to the supply and use of 0.50% max sulphur fuels, the Secretariat reassured the Sub-Committee that there were no indications that the oil supplier organisations intended to shift responsibilities through their guidance and, that ICS and other ship owner associations involved in the work had made it abundantly clear that such a shift in liability was unacceptable, in particular with respect to regulations 14 and 18 of MARPOL Annex VI.

The information and reassurance by the Secretariat with respect to work with oil-supplier organisations was noted by the Sub-Committee.

b) NOX

The Sub-Committee was reminded of the new MEPC work output regarding the use of multiple engine operational profiles for marine diesel engines, recalling that ICS would participate in this work and, recommending that ICS promotes agreement to make the necessary regulatory amendments to allow the use of multiple engine mapping in recognition of its potential to improve ship safety and to optimise engine performance, thus lowering emissions.

The Sub-Committee noted the information provided.

c) Green House Gases

The Sub-Committee recalled that ICS co-sponsored six IMO submissions on GHG matters and the linked matter of the Energy Efficiency Design Index (EEDI) and, that two of the submissions will be considered at the fourth meeting of the intersessional working group on the reduction of GHG emissions from ships (GHG ISWG) (15 – 19

October). The four remaining submissions will be considered at MEPC 73 (22 – 26 October).

The Sub-Committee noted the information provided.

i) GHG

Members were advised that one ICS co-sponsored submission to the GHG ISWG reviewed each of the candidate GHG emissions reduction measures contained within the Initial IMO strategy on reduction of GHG emissions from ships. The second submission proposed strengthening the Ship Energy Efficiency Management Plan (SEEMP) in conjunction with early implementation of the Energy Efficiency Design Index (EEDI) phase 3 for some ship types as short term measures to reduce GHG emissions. The proposal was based on these measures requiring minimal amendments to existing instruments, which could facilitate quick agreement and implementation so as to deliver GHG reductions without undue delay. The proposals were intended to be credible enough to gain support of sufficient member states in order to counter alternative proposals which were expected to advocate mandatory speed reduction and operational efficiency indicators which could lead to a system of operational efficiency indexing.

It was noted that ICS attended two workshops organised by the European Commission and CE Delft in which it was clear that there is wide support amongst European member states for mandatory speed reduction and measures which could lead to a system of operational indexing.

During the second of these European workshops, it was reported, CE Delft provided further proposals based on modelling carried out by UMAS. ICS, aided by other associations represented at the workshop, had expressed serious misgivings with respect to the efficacy of this modelling. In particular the input assumptions which had been used by UMAS to build their model were considered to be questionable to the point of lacking credibility. For example, ships were assumed to be technically and operationally homogeneous, there was no consideration of the 2020 MARPOL VI changes in their fuel price forecast and a very optimistic projected rate of global economic growth. Additionally, the model had been tuned to offer the most profitable outcomes for industry, but UMAS were unable to explain the basis of what had been considered to be the most profitable output.

It was noted that the European workshops were unable to distinguish enhancing the SEEMP from additional reduction measures such as mandatory retro-fitting of technology and operational indexing, there was also a proposal that would have been a de-facto amendment of the MARPOL Convention via amendments to the SEEMP guidelines.

It was further noted that the measures proposed by CE Delft at these workshops clearly had significant support from some European member states.

Finally, the secretariat reported that it is currently proposed to defer consideration of MBM, however the subject of carbon pricing is high on some agendas as a means to reduce GHG emissions and it should be expected that the question of an MBM for shipping will assume increasing importance at future IMO discussions.

The Sub-Committee noted the information provided.

ii) EEDI

The Sub-Committee was advised that four submissions to MEPC 73 were concerned with EEDI. These called for mandatory reporting of EEDI values to the IMO EEDI database, a submission stressing the importance of the EEDI reference lines, a call for early implementation of EEDI phase 3 in 2022 for some ship types but retention of the original implementation date of 2025 for other ship types and a comment paper stressing the importance of retaining mandatory minimum power guidelines.

It was noted that a review of the IMO EEDI database had revealed dramatic under-reporting to IMO of attained EEDI values, such under-reporting was considered to risk undermining efforts to analyse EEDI trends and ensuring that decisions made by IMO on this matter were evidence based.

The submission regarding the importance of the EEDI reference lines had highlighted the problems that would arise from altering historical reference lines and recommended that in cases where an EEDI reduction rate is considered to be inappropriate then it should be the reduction rate, not the applicable reference line, which should be amended.

The submission which had called for early implementation of EEDI phase 3 for specific ship types was intended to counter calls for a universal implementation of EEDI phase 3 for all ship types which was strongly supported by some member states. Based on a review of the EEDI database, notwithstanding concerns about under reporting, it was considered that the readiness of container ships and general cargo ships in 2022 was evident. By making concessions for these ship types but stressing the problems facing other ship types it was hoped to secure a pragmatic outcome on this matter by offering a reasonable compromise which could be supported by a majority of member states and so avoid a universal early implementation for all ship types.

The Sub-Committee noted the information provided.

iii) Minimum Power

The Sub-Committee was advised that ICS had co-sponsored a submission to MEPC 73 commenting on document MEPC 73/5/1 which called for allowing use of a shaft power limitation in order to ease EEDI compliance. This would facilitate the provision of reserve available power, as already discussed by the Marine Committee and C&E Sub-Committee. This document also, however, proposed to remove mandatory minimum power guidelines. The submission co-sponsored by ICS presented a robust rebuttal to the proposal to remove mandatory minimum power guidelines and emphasised the importance of these guidelines to ship safety.

It was reported that a particularly noteworthy aspect of document MEPC 73/5/1 was that it had not explicitly called for deletion of mandatory minimum power requirements in the main body text. Rather this was done via an oblique reference to an annex of the submission, it is possible that some of those who read the document would not have appreciated the full import of the reference to annex 4 of that

document. The Sub-Committee noted that to call for such a profound change via an oblique reference to an annex of a document in a submission concerned with another issue was itself a matter for concern.

It was noted that during the process of consultation for the comment paper which ICS co-sponsored in response to document MEPC 73/5/1, it became apparent that there was some differences of opinion amongst members on the matter of allowing use of reserve power as a possible technical solution to ease EEDI compliance. The concept of reserve power has been discussed by the EEDI review correspondence group and had previously been supported by Members. The Sub-Committee will be advised that the Secretariat is still awaiting further submittals to IMO on the subject of final minimum power guidelines.

The Sub-Committee noted the information provided.

8) Ship Recycling

The Sub-Committee noted that the Industry Working Group on Ship Recycling would reconvene on 25 October 2018, chaired by ICS.

a) European Ship Recycling Regulation

ECSA updated the Sub-Committee on the status of the European Regulation on Ship Recycling which will apply from 31 December 2018, requiring all new ships to possess an Inventory of Hazardous Materials (IHM) and, ships flying the flag of a European Member State will be required to be recycled in a facility on the European List of approved facilities. The Sub-Committee noted that the European List did not contain sufficient capacity to recycle European ships and that recent press statements by the NGO Platform and others were contradicted by EMSA data. It was noted that ECSA, ICS and others had written to Commissioner Vella expressing concern about the shortfall in the list and its failure to represent global compliant ship recycling capacity and, requesting clarity as to what shipowners were expected to do in the event that this problem remained unresolved.

ECSA reported that two Turkish yards were likely to be included, with two further inspections of Turkish yards anticipated for 2019. It was noted that visits have been made to two Indian Yards, with four scheduled visits soon and four further visits anticipated in 2019. It remained unlikely that Indian Yards would be added to the list in the immediate future. It was noted that the application and approval process for Chinese yards was now on hold as a consequence of the waste import ban.

The Sub-Committee was advised that ECSA would consider an action plan on addressing the issues arising from the application of the European Regulation.

The Sub-Committee noted the information provided and agreed that ICS should support to the ECSA position paper circulated prior to the meeting.

b) Hong Kong Convention

The Sub-Committee noted that both Japan and Germany were expected to ratify the Convention in the near future and, that the process toward ratification was underway in India. It was noted that China was unlikely to ratify any time soon, but Hong Kong intended to, pursuant to approval by the Chinese government. Concern was expressed over the change in Chinese policy on the Hong Kong Convention, and the Secretariat was urged to work with industry partners on ways in which the benefits of

ratification could be conveyed to China. It was reported that Liberia was once again considering ratification, and the Secretariat was urged to communicate with Liberian Shipowners Association and LISCR in order to establish the impact of such a ratification under the current and anticipated circumstances.

c) Transitional Measures

The Sub-Committee did not see a need to revise the Transitional Measures for Shipowners Selling Ships for Recycling at the present time.

9) Bunker Fuel Quality

a) Guidance for fuel oil suppliers

The Secretariat reported its concerns about an IBIA submission to MEPC 72 which could form a basis for the development of IMO guidance, to the last Sub-Committee. In order to address these concerns, ICS along with INTERTANKO developed a revised draft that has now been submitted to MEPC 73 as document MEPC 73/5/4. Following discussions on this matter, IBIA and IPTA have also agreed to co-sponsor this submission.

The Sub-Committee noted the information provided.

b) ICS submission to MSC 100 regarding effective implementation of existing provisions for fuel quality and safety in IMO conventions

The Sub-Committee noted that ICS had developed a draft submission to MSC 100 that has been circulated as MC(18)80. It was reported that the submission provided proposals to assist the IMO Marine Safety Committee to address concerns related to fuel oil safety as follows:

- Separate the consideration of fuel oil safety issues from those related to emissions to air and ensure that fuel safety matters are considered by MSC. This could then lead to incorporating fuel safety provisions within the SOLAS Convention instead of Regulation 18 in MARPOL Annex VI;
- encourage parties to MARPOL Annex VI to establish bunker supplier licensing schemes; and
- IMO GSIS module should be improved to provide greater granularity of fuel quality and safety reports which are uploaded onto the system.

The Sub-Committee expressed strong support for the ICS proposals, noting that the potential by States to misinterpret them as an attempt to avoid the 2020 deadline should be avoided. Concern was expressed as to how the shift of safety provisions for fuel from MARPOL to SOLAS would be made in a timely fashion, given that a SOLAS amendment would not be feasible before 2024, four years after the entry into force of the sulphur restrictions. It was agreed that no changes to the instrument would be feasible, but an MSC Circular could serve as a temporary solution, noting MARPOL Regulation 18 would continue to apply, albeit with a renewed focus on safety.

c) Amsterdam Rotterdam Antwerp (ARA) area fuel quality working group.

Members recalled that ICS hosted the 7th meeting of the ARA fuel quality forum on 9 May 2018. It was noted that the forum made progress on the work packages looking

at fuel supply chain and fuel quality. The Secretariat advised that the next meeting of the ARA forum is scheduled to be hosted by KVNR on 14 November 2018.

It was agreed that ICS, in cooperation with ECSA and others, should work to compile a list of ports worldwide that permitted or prohibited the use of open loop scrubbers or, the discharge of scrubber water. It was noted that the list was unlikely to be exhaustive, and that a caveat would need to be included to this effect as a consequence.

10) Use of HFO in the Arctic/ Black Carbon

The Sub-Committee was advised that MEPC 72 tasked the PPR Sub-Committee with preparation of a set of Guidelines on mitigation measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters and, on the basis of an assessment of the impacts, develop a ban on HFO for use and carriage as fuel by ships in Arctic waters. The PPR Sub-Committee was instructed to develop a definition of HFO fuel oil. Several member states emphasised the importance of agreeing to an appropriate impact assessment methodology to enable the PPR Sub-Committee to undertake its work. In response to these concerns Canada and Russia had made a submission to MEPC 73 which provided comments received by an informal correspondence group on the determination of an appropriate impact assessment methodology (MEPC 73/Inf.19).

It was noted that the issue of prohibiting the use of HFO fuel oil in the Arctic had become conflated with the separate matter of emissions of Black Carbon, since some parties were also strongly advocating the measure as a means of reducing emissions of Black Carbon from ships.

The Sub-Committee noted that ICS continued to participate actively in the correspondence group which had been considering potential measures to control emissions of Black Carbon from ships. Some members of the correspondence group had continued to refer to "PM" and measures which could reduce emissions of PM in general. ICS had re-iterated to the correspondence group that IMO had adopted the Bond definition of Black Carbon and that this was a sub-species of PM. As such the correspondence group was not to consider emissions of PM in general but could only consider emissions of Black Carbon as defined by Bond et al. Some correspondents continued to advocate prohibiting use of HFO as a means to reduce emissions of Black Carbon despite conflicting research and evidence that for some engines at least such a change would actually increase emissions of Black Carbon. The Secretariat also attended an ICCT workshop on the matter in September. Previous ICCT reports on this matter informed the work of IMO and had been influential with member States therefore it was considered to be important to participate and influence the direction of future ICCT reports on the matter.

The Sub-Committee noted the information provided.

11) MARPOL Annex IV

The Sub-Committee was advised that there was nothing to report for this agenda item.

12) Grey Water

The Sub-Committee recalled the invitation of MEPC 72 to Member States to share their experiences with, or knowledge acquired on, the impact of ship grey water to MEPC 73. It was noted that to date, only one related information document has been submitted to MEPC 73 - MEPC 73/INF.28 (WWF), which provides information on Shipborne grey water production estimates using 2016 ship traffic data for the Canadian Arctic, as well as projected future estimates for 2025/2035 and treatment system options.

The Sub-Committee noted the information provided.

13) Waste Reception in Chinese Ports

Members expressed thanks to ICS and HKSOA for their ongoing efforts to raise concerns with the Chinese Authorities. Members were urged to report any instances of difficulties encountered with Waste Discharge to ICS so they could be raised with the Chinese authorities. HKSOA and ICS would continue to monitor the situation and endeavour to gain clarity as to the reality of PRF provision in Chinese ports.

14) Electric and Battery Propulsion Systems

The Sub-Committee was advised that there was nothing to report for this agenda item.

15) National/Regional Developments (Reporting Item)

a) USCG VGP

Members were reminded that information on the latest developments with respect to the USCG Vessel General Permit had been circulated in ICS(18)32 US Developments – August 2018.

b) Chinese ECA and Water Pollution From Ships

It was agreed that the Secretariat would append information concerning the Chinese ECA and Water Pollution from Ships regulations to the report of the Sub-Committee.

c) Rotterdam Antwerp Waste Management Form.

The Sub-Committee considered the Rotterdam Antwerp Waste management form, circulated prior to the meeting (ENV(18)12). It was noted that the form went beyond the scope of both the EU Regulation and the MARPOL V requirements. The Sub-Committee agreed that ICS should co-sign a letter with ECSA to the relevant Port Authorities, noting the discrepancies and expressing concern.

16) Any Other Business

There were no items of other business.

17) Date of Next Meeting

Following the deliberations of the Marine Committee, it was agreed that the Sub-Committee would next meet on It will be proposed to hold the next meeting of the Meeting on Tuesday 19 March 2018, prior to the Marine Committee.

INTERNATIONAL CHAMBER OF SHIPPING

Environment Sub-Committee

02/10/2018

10:00 until 16:00



Attending:

Kathy Metcalf

Chair

Anders Brodje
Ludovic Laffineur
Robert Turner
Per Winther Christensen
Olof Widén
Bruno Caillard
Wolfgang Hintzsche
John Andreopoulos
Martin Cresswell
Fabio Faraone
Maurizio d'Amico
Tamio Kawashima
Tim Clark
Daijiro Mizushima
Nick Lurkin
Anna Ziou
Robert Carington
Fredrik Larsson

Bahamas
Belgium
Canada
Denmark
Finland
France
Germany
Greece
Hong Kong
Italy
Italy
Japan
Japan
Japan
Netherlands
UK
UK
Sweden

Rob Griffiths
Gudrun Janssens

CLIA
ECSA

With:

John Stawpert
Jonathan Spremulli
John Bradshaw
Chris Oliver
Matthew Williams
Sunil Krishnakumar
George Charalampidis

ICS
ICS
ICS
ICS
ICS
ICS
ICS

Conference:

Johan Roos

Interferry

Apologies:

Maria Skipper Schwenn

Denmark