

MARINE ENVIRONMENT PROTECTION
COMMITTEE
74th session
Agenda item 5

MEPC 74/5/26
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AIR POLLUTION AND ENERGY EFFICIENCY

Comments on documents MEPC 74/5/5

Submitted by ICS, BIMCO, IPTA, RINA and ITF

SUMMARY

Executive summary: The co-sponsors comment on document MEPC 74/5/5 (France et al.) and provides recommendations for the consideration of the Committee

Strategic direction, if applicable: 3

Output: 3.5

Action to be taken: Paragraph 11

Related documents: MEPC 74/5/5 and resolution MEPC.308(73)

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.1) and comments on document MEPC 74/5/5 (France et al.) and provides recommendations for the consideration of the Committee.

2 The co-sponsors consider that the proposal in document MEPC 74/5/5 for shaft power limitation (ShaPoLi) provides a basis for further discussion.

3 Document MEPC 74/5/5 includes draft amendments to the *2014 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships* (resolution MEPC.245(66), as amended by resolutions MEPC.263(68), MEPC.281(70) and MEPC.308(73)) (2018 Guidelines for calculating the EEDI).

4 The co-sponsors consider that any amendments to the 2018 Guidelines for calculating the EEDI should be held in abeyance until the Committee is able to review and agree final minimum power guidelines.

Discussion

5 ShaPoLi is a means to ease compliance with both the necessary EEDI reductions and with the *2013 Interim guidelines for determining minimum propulsion power to maintain the manoeuvrability of ships in adverse conditions* (MEPC.1/Circ.850/Rev.2) (2013 interim minimum power guidelines).

6 The Committee was advised at MEPC 71 that draft revised 2013 Interim guidelines for determining minimum propulsion power to maintain the manoeuvrability of ships in adverse conditions (draft minimum power guidelines) were not sufficiently mature to be finalized at that session (MEPC 71/5/13, paragraph 23). This is primarily because of outstanding concerns over the weather and advance speed conditions which would underpin the level 2 simplified assessment method and has resulted in the interim minimum power guidelines remaining in use. The Committee has not been updated on this matter since MEPC 71 (a period of two years). This means that the 2013 interim minimum power guidelines will extend into EEDI Phase 2.

7 The minimum propulsion power established by applying the level 2 simplified assessment method is very sensitive to the weather conditions and advance speed used for the assessment. Seemingly minor changes to these conditions can result in a very significant difference in required minimum propulsion power. Therefore, it is essential that the weather and advance speed (or ship control/manoeuvrability parameters) conditions for the assessment should be properly evaluated by the Committee and found to be suitable.

8 Although ShaPoLi is considered to be a pragmatic measure to reconcile potentially conflicting demands between the EEDI regulation and minimum power requirements, amendments to the 2018 Guidelines for calculating the EEDI should not be agreed until the draft minimum power guidelines have been finalized and agreed by the Committee.

9 Awaiting completion of the draft minimum power guidelines would allow a proper evaluation of the difference in power between that which would form the basis of the ships EEDI certification and the ShaPoLi power rating. This would confirm whether that difference can be satisfactorily closed by applying ShaPoLi as, until the draft minimum power guidelines are completed, it is not possible to say with certainty that ShaPoLi will in itself alleviate the concerns which have led to its development.

Recommendations

10 The co-sponsors recommend that should the proposals provided in MEPC 74/5/5 be taken forward then:

- .1 the Committee should encourage interested Member States and international organizations to expedite work to complete the draft minimum power guidelines;
- .2 amendments to the 2018 Guidelines for calculating the EEDI to incorporate the ShaPoLi concept should not be agreed until the draft minimum power guidelines have been completed and agreed by the Committee; and
- .3 before agreeing amendments to the 2018 Guidelines for calculating the EEDI to incorporate the ShaPoLi concept, the Committee should complete an evaluation of the different power ratings at the EEDI certification rating and ShaPoLi reserve power rating to confirm that the proposal is a practicable solution to address this difference in required power outputs.

Action requested by the Committee

11 The Committee is invited to consider the comments and recommendations contained in this document and to take action as appropriate.
