

CONSIDERATION AND ADOPTION OF AMENDMENTS TO MANDATORY INSTRUMENTS

Amendments to MARPOL Annex VI – Inclusion of regulations on energy efficiency for ships

Review of EEDI

Submitted by ICS

SUMMARY

Executive summary:	This paper comments on submission MEPC 62/6/3 and provides a proposal for on-going review of the progress of implementation of the EEDI as experience is gained in its application.
Strategic direction:	7.3
High-level action:	7.3.2
Planned output:	7.3.2.1
Action to be taken:	Paragraph 7
Related documents:	MEPC 62/6/3

Introduction

1. This document is submitted in accordance with the provisions of paragraph 4.10.4 of MSC-MEPC.1/Circ.2 and comments upon paper MEPC 62/6/3 submitted by the Secretariat.
2. The Secretariat submission (MEPC 62/6/3) provides as an Annex to the paper, the text of draft amendments to MARPOL Annex VI, proposing the inclusion of mandatory regulations on energy efficiency for ships. Draft regulation 21.5 provides a provision for review of EEDI phase in periods and reduction rates to ensure that during the later phases of application, due account is taken of experience gained during earlier phases.
3. It is currently proposed that 'At the beginning of Phase 1, 'the Organization shall review the status of technological developments and, if proven necessary, adjust the time periods and reduction rates set out in phases 2 and 3'.
4. ICS fully supports the adoption and application of the EEDI regulations and in order to facilitate their successful application considers that it would be beneficial to review each phase of application before it is completed so that during the following phases, appropriate account can be taken of the experience gained and, if proven necessary and /or beneficial, adjust the time periods and reduction rates to be achieved during subsequent phases.
5. This is to ensure the availability of accurate and reliable information that will both facilitate good decision making and demonstrate the improvements in overall levels of efficiency that are being achieved across the world fleet.

6. ICS therefore suggests:

'At the beginning of Phase 1 **and at the midpoint of phase 2**, the Organization shall review the status of technological developments and, if proven necessary, adjust the time periods and reduction rates set out ~~in Phases 2 and 3.~~'

Recommendations

7. The Committee is invited to take note of the comment above and to take action as appropriate.