

MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 4

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AIR POLLUTION AND ENERGY EFFICIENCY

Calculation of required EEDI for specialised ships designed to carry Fruit Juices in bulk

Submitted by ICS

SUMMARY

Executive summary: This submission highlights concern with the application of standard EEDI reference lines to small groups of specialised ships, optimised for specific cargoes and trades. Specialist refrigerated Fruit Juice carriers are used as an example of this issue.

Strategic direction: 7.3

High-level action: 7.3.2

Planned output: 7.3.2.1

Action to be taken: Paragraphs 10 and 11

Related documents: Resolution MEPC.203(62)

Introduction

1 ICS has been made aware that there is serious concern with the approach of defining Fruit Juice carriers as chemical tankers. In addition to the existence of a very large scatter in data for estimated EEDI values for this sector, the values obtained are significantly higher than for chemical carriers of similar size. It is notable that these ships form a very small fleet of specialised ships (less than 15 ships are identified in the IHS database) whose design has been optimised to provide improved efficiency for a specific cargo on specific trades.

2 It should be recalled that when the EEDI reference lines were being developed it was agreed that reference lines were intended to include ships that could do the same work. ICS considers that when decisions are being made on the correct category to be applied to these sectors it will be essential to provide a framework to facilitate consistency and fairness of the outcomes from such decisions. It will also be important to ensure that the design of such ships does not become less efficient in order to arbitrarily assign an inappropriate standard ship type.

Discussion

3 It is difficult to derive meaningful statistical analysis for refrigerated Fruit Juice carriers as there are only a very small number of such ships currently in service. However the data that is available, although relating to a very small number of ships, demonstrates a wide scatter due to the design parameters of the individual ships being tailored to the specific cargoes being carried and the routes being served.

4 Resolution MEPC.203(62) requires that for ships falling into one or more categories, the most onerous requirement is to be applied. This fully justified decision was taken to ensure that ships carrying the same cargoes would be treated in the same way. However, as the EEDI is increasingly applied to new ships over the coming months it can be expected that a number of specialist ship types, optimised to provide a high level of efficiency on dedicated trades will be identified. This will be a particular issue for very small sectors such as the dedicated Fruit Juice carriers where less than 15 ships are identified in the IHS database. Pragmatic decisions will need to be made on the correct category to be applied to such ships.

5 ICS considers that when such decisions are being made on the correct category to be applied to these sectors it will be essential to provide a framework to facilitate consistency and fairness. It will also be very important to ensure that the design of very specialised ships does not become less efficient in order to fit them into one of the definitions for standard ship types.

Conclusions

6 There does not appear to be any clear technical or logical reason as to why Fruit Juice carriers should not be addressed in the same way as other refrigerated cargo ships.

7 It can be anticipated that as the EEDI is applied over the introductory period, there will be a need for specific consideration for other specialist ships that have been optimised for a dedicated trade. It will be necessary to provide consistency by having a clear internationally agreed understanding as to how such ships are to be addressed without reducing the overall efficiency of the transport system for those specific trades.

Proposals

8 Ships dedicated to the carriage of fruit juice in refrigerated cargo holds should be addressed in the same way as other refrigerated cargo ships when referring to tables 1 and 2 of resolution MEPC.203(62).

9 Consideration should be given to the development of an MEPC circular providing unified interpretations on the appropriate category to be applied for small specialised ship sectors in dedicated trades. Such a circular could be subject to periodic revision.

Action to be taken

10 The Committee is invited to consider that dedicated Fruit Juice carriers could be appropriately addressed as refrigerated cargo ships.

11 The Committee is further invited to note the general points made above and to consider the development of an MEPC Circular containing guidance on the treatment of small clearly defined specialist ship sectors, optimised for a dedicated trade.
