

INTERSESSIONAL MEETING OF THE  
WORKING GROUP ON REDUCTION OF  
GHG EMISSIONS FROM SHIPS  
20th session  
Agenda item 2

ISWG-GHG 20/2/16  
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**DEVELOPMENT OF NEW AND/OR REVISION OF EXISTING GUIDELINES,  
PROVISIONS, GUIDANCE AND OTHER DOCUMENTS, AS APPROPRIATE, FOR  
SUPPORTING THE UNIFORM AND EFFECTIVE IMPLEMENTATION OF THE IMO  
NET-ZERO FRAMEWORK**

**Guidelines on the determination of the annual IMO GFI Registry administration fee**

**Submitted by ICS**

**SUMMARY**

*Executive summary:* The annex to document MEPC/ES.2/3 (Secretariat) proposes the development of "Guidelines on the determination of the annual IMO GFI Registry administration fee (regulation 38.3)" to be paid by ships from 2028. This annual administration fee will be payable in addition to the GHG emissions pricing contributions which the vast majority of ships, of 5,000 GT and above, will have to pay to the IMO Net-Zero Fund to ensure compliance with the regulations of the IMO Net-Zero Framework. ICS acknowledges the possible need to support the establishment and initial operation of the GFI Registry by the Organization in advance of substantial revenue being received by the IMO Net-Zero Fund in 2029, but suggests that these guidelines should clarify that GFI Registry annual administration fee should be minimal/nominal or zero and that a cap should be placed on the maximum annual fee at no more than US\$ 500 per ship.

*Strategic direction, if applicable:* 3

*Output:* 3.2

*Action to be taken:* Paragraph 6

*Related documents:* MEPC/ES.2/2, MEPC/ES/2/2/2, MEPC/ES.2/3; MEPC 83/17, MEPC 83/WP.11 and MEPC 83/7/5

**Introduction**

1 The annex to document MEPC/ES.2/3 (Secretariat) proposes the development of the "Guidelines on the determination of the annual IMO GFI Registry administration fee (regulation 38.3)" to be paid by ships from 2028, in addition to the GHG emissions pricing

contributions that the vast majority of ships, of 5,000 GT and above, will have to pay to the IMO Net-Zero Fund, to ensure compliance with the regulations of the IMO Net-Zero Framework.

2 Draft regulation 38 of MARPOL Annex VI reads as follows:

- "2 Each ship to which this chapter applies shall open by 1 October 2027 an account with the IMO GFI Registry and shall pay by 30 June 2028, and by 30 June of each year thereafter, the annual administration fee to the IMO GFI Registry.
- 3 The Secretary-General of the Organization shall determine the annual administration fee to cover the administrative costs of the IMO GFI Registry, taking into guidelines developed by the Organization".

3 Whilst ICS has every confidence that the Secretary-General will determine the annual administration fee at an appropriate level, ICS notes that there will be in excess of 30,000 ships above 5,000 GT in the international fleet which will probably need to register with the IMO GFI Registry, and that the initial cost of establishing and operating the IMO GFI Registry is most unlikely to exceed US\$ 15 million. ICS therefore suggests that the "Guidelines on the determination of the annual IMO GFI Registry administration fee (regulation 38.3)" should place a cap on the maximum quantum of the annual IMO GFI Registry administration fee at US\$ 500 per ship.

4 Whilst ICS acknowledges the possible need to support the establishment and initial operation of the IMO GFI Registry by the Organization in advance of substantial revenue being received by the IMO Net-Zero Fund in 2029, these guidelines should clarify that the GFI Registry administration fee to be paid by ships, that is payable in addition to GHG emissions pricing contributions, should be minimal/nominal or zero and not be seen as a source of additional revenue to be used for purposes other than the establishment and initial operation of the IMO GFI Registry.

5 Given that in 2029, there should not be less than US\$ 10 billion to US\$ 15 billion received as GHG emissions pricing contributions by the IMO Net-Zero Fund, the guidelines should also provide that the Secretary-General should have discretion to determine, for 2030 onwards, that the annual IMO GFI Registry administration fee may be zero.

### **Action requested of the Working Group**

6 The Working Group is requested to consider the suggestions contained in this document and take action as appropriate.