

# IMO PPR 11 Meeting Summary

12 March 2024



The 11th session of the IMO's Sub-Committee on Pollution Prevention and Response (PPR 11) was held 19-23 February 2024 at the IMO Headquarters in London, supplemented by hybrid (remote) arrangements.

LISCR participated in the following group in addition to the plenary:

- Working Group on Prevention of Air Pollution from Ships
- Working Group on Revision of MARPOL Annex IV
- Working Group on Marine Plastic Litter from Ships
- Drafting Group on In-water Cleaning

## Opening

### Attacks on ships in the Gulf of Aden and the Red Sea

A large number of delegations expressed concerns over the safety and welfare of seafarers, freedom of navigation, and stability of the global supply chain following the attacks by Houthi rebels on commercial ships in the Red Sea and the Gulf of Aden. In this context, delegations commended the Secretary-General for bringing this matter to the attention of the United Nations Security Council at its special session on 3 January 2024 and for his communication and dialogue with all relevant parties, as well as and for prioritizing the well-being of seafarers in his initiatives.

## Chemicals

Under this agenda item, the routine update of chemical substances (new products, cleaning additives, etc.) is examined for release as MEPC.2 Circular after review by the Technical Group on the Evaluation of Safety and Pollution Hazards of Chemicals (ESPH Working Group).

PPR 11 endorsed the work of ESPH 29 and the MEPC.2/Circ.29 released on 1 December 2023, including:

- The evaluation substances for inclusion in list 1 (Pure or technically pure products and mixtures assessed as a whole);
- The evaluation of trade-named mixtures and their respective inclusion in list 3 ((Trade-named) mixtures containing at least 99% by weight of components already assessed by IMO, presenting safety hazards) substances, along with the consequential additions to list 5 (Substances only used as components in trade-named mixtures) substances; and

- The evaluation of cleaning additives.

Another set of updates was tasked to the next ESPH meeting for inclusion into MEPC.2/Circ. 30 for release on 1 December 2024.

### Tank cleaning additives guidance note

Following the discussion at the ESPH29, PPR 11 agreed to the draft Revised tank cleaning additives guidance note and reporting form for approval by MEPC 82.

### Toxic cargoes

PPR 11 noted the deliberations of ESPH 29 with regard to products that have a newly assigned toxic rating in column k of the carriage requirements in the latest revision of chapter 17 of the IBC Code and lack toxic vapour detection equipment.

PPR 11 also noted the discussion at the ninth session of the Sub-Committee on the Carriage of Cargoes and Containers (CCC 9) in relation to the entry into the enclosed spaces.

### Tank washing operations and prewash procedures for products with a high melting point and/or high viscosity.

The 79th Session of the Marine Environment Protection Committee (MEPC 79) had agreed to include "Amendments to MARPOL Annex II in order to improve the effectiveness of cargo tank stripping, tank washing operations and prewash procedures for products with a high melting point and/or high viscosity", to the work of the PPR Sub-Committee.

There was an information paper submitted to PPR 11, which provides further information to improve the effectiveness of cargo tank stripping, tank washing operations and prewash procedures for products with a high melting point and/or high viscosity.

Caution was expressed about the proposed 45-minutes hot water cleaning and the availability of reception facilities.

PPR 11 instructed ESPH 30 to further consider proposals.

### In water hull cleaning

Biofouling is the build-up of aquatic organisms, such as algae or small animals, on marine surfaces that can lead to the introduction of potentially invasive species to new environments, where they may threaten native species and cause irreversible damage to biodiversity. Additionally, biofouling increases the drag of ships, forcing them to burn more fuel to maintain speed.

MEPC 80 adopted resolution MEPC.378(80) *on the 2023 Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (2023 Biofouling Guidelines)*.

PPR 11 agreed not to re-open 2023 guidelines but focus on the following areas, which will be addressed by the correspondence group (CG):

- planning, conducting, and reporting on in-water cleaning operations, including documenting, and mitigating any damage to anti-fouling coatings;
- verification and testing of in-water cleaning systems, including compatibility with anti-fouling coatings and, if

- feasible, measurable performance criteria such as on removal, capture, and effluent contents;
- conducting pre-cleaning and post-cleaning inspections; and
- verification or other form of expectations for in-water cleaning service providers.

## Black Carbon

IMO has been addressing black carbon under “Air Pollution” since MEPC 58 (2008). PPR 11 finalized the following two guidelines for approval by MEPC 82.

### **Draft Guidance on Best Practice on Recommendatory Goal-Based Control Measures to Reduce the Impact on the Arctic of Black Carbon Emissions from International Shipping**

This guidance is intended to assist ship operators/companies in their efforts to reduce Black Carbon (BC) emissions from their ships operating in or near the Arctic in measurable and concrete ways.

The ship operator/company may consider setting a voluntary BC emission reduction target threshold;

After setting such a target threshold, the ship operator/company should identify and consider what practices and/or control measures are available to the ship which could be implemented to achieve the set reduction target threshold for BC emissions.

The ship operator/company should consider developing a BC Management Plan taking into account the above and include periodic monitoring for managing and ensuring success in reduction efforts.

The guidelines attached “Technology options, measures, applicability and other considerations for BC control policies”. However, this is intended for information purposes only and does not require or recommend any measures.

### **Draft guidelines on recommendatory Black Carbon emission data collection, monitoring, and reporting**

The purpose of these Black Carbon Guidelines is to specify the recommendations for the measurement, monitoring, and reporting of BC emissions data from marine diesel engines or exhaust gas treatment systems, in combination or individually, in order to enhance development of recommendations and regulations to reduce the impact on the Arctic of BC emissions.

The guidelines attach a detailed reporting protocol, which specifies items to be included in such a report.

BC measurements should be undertaken at least once for each period with a total duration of seven days while operating in or near the Arctic, at the running load of the marine diesel engine.

The guidelines anticipate future development of measurement technology and allow the use of alternative methods of measurement.

## Exhaust Gas Cleaning System (EGCS) wash water discharge

### **Regulatory matters**

While there was intensive discussion at PPR 11, the meeting failed to achieve a consensus.

Key disagreements were:

- Impacts on local marine environments caused by the wash water;
- Justification to ban the wash water discharge after accepting a compelling need for installing EGCS to meet 2020 low sulphur requirements; and
- Interpretation of the coastal State’s jurisdiction at the Exclusive Economic Zone and beyond.

Liberia strongly argued about the second bullet point above. The matter will be further addressed at PPR 12 scheduled for January 2025.

## Regional regulation database

PPR 11 encourage Member States to submit information on the local restriction of the EGCS wash water discharge under the "National Maritime Legislation" module of GISIS.

## Emission factor

PPR 11 tried to establish representative emission factors for use in the environmental risk assessment of the discharge water from EGCS. However, opinions were divided as to:

- Whether to use average or worst case scenario; and
- Whether to limit discharge from the open loop system.

PPR 11 saw the merit of tasking the matter to the GESAMP group. However, it required the establishment of a work mechanism, in particular, funding arrangements.

Meanwhile, Members were invited to submit relevant data to a future session.

## Editorial corrections to the 2021 EGCS Guidelines (resolution MEPC.340(77))

PPR 11 agreed the following corrections:

- "7.2.4 recording the aggregated time in excess of 15 minutes over any rolling 12-hour period that the differential PAH value is above the set limit value by not more than 100%;
- 7.2.6 recording the aggregated time in excess of 15 minutes over any rolling 12-hour period that the rolling average differential turbidity value is above the set limit value by not more than 20%".

## Multiple engine operational profiles and Engine re-certification

### Background and base proposal

To optimize engine performance and fuel consumption, electronically controlled engines may use different sets of engine operation parameters (fuel injection, inlet and exhaust valve operation, charge air, exhaust bypass/wastegate or exhaust after treatment controls and auxiliary control devices) depending on its revolution and load. However, concerns are expressed that allowing such a flexible setting could be used to escape from the NO<sub>x</sub> certification, which was done based on a particular engine revolution and engine load. Some IMO Member States saw this as a "defeat" (cheating) device.

PPR 11 prepared draft amendments to the MARPOL Convention (Chapter VI, regulation 13) and the NO<sub>x</sub> Technical Code for approval by MEPC 82 and subsequent adoption by MEPC 83.

Key features of the amendments are:

- Current test cycles are kept unchanged with clarifications (see below);
- All possible controls and settings, including the use of an Auxiliary Control Device (ACD), have to be declared to the Administration and kept in the technical file.
- There should not be an irrational reduction at the test points (mode points).
- Additional test points (mode points) are required.

## Selection of test cycle

PPR 11, having considered various submissions to this session and past sessions, clarified the engine test cycle as follows:

- E3 Cycle: Previously defined as “propeller-law-operated main and propeller-law-operated auxiliary engines” was defined as “fixed pitch propeller propulsion engine or a propeller-law operated non-propulsion engine”.
- E2 Cycle: Previously defined as “controllable-pitch propeller” was defined as “a propulsion engine that does not operate with a fixed pitch propeller, including an engine fitted as part of a diesel-electric installation or an engine operation with a controllable-pitch propeller”.
- D2 Cycle: Previously defined as “constant-speed auxiliary engine” was defined as “a non-propulsion engine that is a constant speed engine”.
- C1 Cycle: Previously defined as “variable-speed, variable-load auxiliary engines, not included above,” was revised to read as “non-propulsion engine that operates as a variable speed engine, not included above”. (i.e. distinction of “main” and “auxiliary” engines was removed.

## Engine re-certification

In recent years, there have been some cases of engine conversion for improving GHG reduction performance (e.g., converting engines to make use of low/zero emission fuels).

PPR 11 prepared re-certification procedures for approval by MEPC 82 and subsequent adoption by MEPC 83. Key features are:

- The procedure applies to an Individual Engine or to an Engine Group represented by the Parent Engine. It shall not be accepted for Engine Family certification.
- Instead of 100%, 85% load is allowed.

## Local-level marine spill contingency plans

PPR 11 developed the draft guidelines for developing a local oil/hazardous and noxious substances marine pollution contingency plan for approval by MEPC 82.

This guide is aimed primarily at key local governmental institutions to assist them in developing a marine pollution contingency plan covering their responsibilities.

## Measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters

MEPC 76 adopted the prohibition of the use and carriage of Heavy Fuel Oil in the Arctic by Resolution MEPC.329(76), which will enter into force on 1 July 2024, but ships with protected fuel tank arrangements and domestic ships can be exempted until 1 July 2029. The ban does not include carriages as cargo.

Taking into account the input from relevant sub-committees, PPR 11 prepared draft guidelines on mitigation measures to reduce risks of use and carriage for use of heavy fuel oil as fuel by ships in Arctic waters for approval by MEPC 82.

## IBTS Guidelines and amendments to the IOPP Certificate and Oil Record Book

PPR 11 recalled, among other things, that MEPC 78 agreed, in principle, that forced evaporation was acceptable as a means for the disposal of oily bilge water and invited proposals to the PPR Sub-Committee to add an appropriate regulation in MARPOL Annex I accordingly.

Having noted that no documents had been submitted to this session regarding potential amendments to MARPOL Annex I, PPR 11 agreed once more to defer further consideration of this agenda item and all associated documents to its next session.

## MARPOL Annex IV and associated guidelines

### IBTS Guidelines and amendments to the IOPP Certificate and Oil Record Book

MEPC 74 instructed PPR to include a revision of MARPOL Annex IV and associated guidelines to introduce provisions for record-keeping and measures to confirm the lifetime performance of sewage treatment plants.

### Work scope and methods

There was a proposal to prioritize matters that were simpler to implement and/or that are relevant to all ships, should be prioritized so that they can be finalized in a timely manner. However, PPR 11 did not support the proposal.

PPR 11 agreed to the Type Approval Guidelines being finalized first, to be followed by the approval and adoption of the Type Approval Guidelines, the revised MARPOL Annex IV and the Implementation Guidelines as a whole package.

There was an intense discussion on the introduction of the “data collection period” or “experience building phase (EPB)”. However, PPR 11, while agreeing to encourage data collection on the effluent quality, did not formally introduce EPB.

### Testing

Liberia, together with a co-sponsor, presented questions on the commissioning test.

With regard to the commissioning test, a preliminary discussion took place at PPR 11, subject to further review by PPR 12, which indicated:

- Commissioning testing is needed and may be undertaken after the delivery.
- The International Sewage Pollution Prevention Certificate will indicate that the commissioning test is to be completed. However, discharge of effluent should be allowed.

However, a few members expressed concerns that such an approach, i.e. discharge from an untested system, may not be acceptable in the eyes of other stakeholders, e.g. Port State control officials.

### Definition of "person"

There was a proposal to amend the definition of "person" in draft amendments to MARPOL Annex IV as well as the understanding on item "number of persons which the ship is certified to carry" in appendix I of MARPOL Annex IV (Form of International Sewage Pollution Prevention Certificate), in order to facilitate further development of the draft amendments to MARPOL Annex IV.

A preliminary discussion at PPR 11 was to set up the number based on the capacity of the sewage systems of the ship. However, the group also noted that there needed to be a clear methodology for calculating the numbers.

## Plastic litters

MEPC 73 adopted the action plan to address marine plastic litter from ships (resolution MEPC.310(73)) (Action Plan). The issue also has been addressed under the London Convention meeting (shore-generated plastic garbage that might end up at sea).

### Plastic pellet

A plastic pellet is a mass of pre-formed moulding material having relatively uniform dimensions, used as feedstock in plastic product manufacturing operations. Plastic pellets are transported in various forms, including flakes, granules and powders and can be referred to as resin or nurdles.

PPR 10 (April 2023) agreed that

- Plastic pellets should not be carried in bulk;
- Develop non-mandatory guidelines first and then; and
- Consider a mandatory measure.

### Non-mandatory circular

PPR 11 developed a draft MEPC Circular on Recommendations for the Carriage of Plastic Pellets by Sea in Freight Containers for approval by MEPC 81 scheduled for March 2024. Key points of the circular are:

- Plastic pellets should be packed in good quality packaging which should be strong enough to withstand the shocks and loadings normally encountered during transport;
- Transport information should clearly identify, as an addition in the cargo information required by SOLAS regulation VI/2, those freight containers containing plastic pellets. In addition, the shipper should supplement the cargo information with a special stowage request.
- Freight containers containing plastic pellets should be properly stowed and secured:
  - under deck wherever reasonably practicable; or
  - inboard in sheltered areas of exposed decks.

### Mandatory measures

At PPR 10, the following options were expressed:

- .1 assignment of an individual UN number (class 9) for plastic pellets;
- .2 an amendment to appendix I of MARPOL Annex III that would recognize plastic pellets as a "harmful substance";
- .3 a new chapter to MARPOL Annex III that would prescribe requirements for the transport of plastic pellets in freight containers without classifying the cargo as a harmful substance/dangerous goods;
- .4 an amendment to MARPOL Annex III to split the definition of harmful substances into substances covered by the IMDG Code and substances that are not (e.g. plastic pellets) combined with new regulations in MARPOL Annex III on the transport of plastic pellets outside of the scope of the IMDG Code; or
- .5 MARPOL Annex V.

Submissions and opinions at PPR 11 were still divided, while it was converging into either option .1 or option .3 above. PPR 12 scheduled for January 2025 will further consider the matter.

## Clean-up operation guidelines

PPR 11 prepared the draft IMO Guidelines on good practice relating to clean-up of plastic pellets from ship-source releases for approval by MEPC 82.

### Any other business

## Reduction of Volatile Organic Compound (VOC)

There was a proposal to request the SSE Sub-Committee to consider a requirement for new crude oil tankers to be fitted with P/V valves with a minimum opening pressure of 0.20 bar. This document also emphasizes the importance of involving the relevant stakeholders in the value chain in the work to improve the existing regulatory framework on VOCs.

Several concerns were expressed, including the need for the holistic approach in reducing VOC emissions at terminals.

PPR 11 requested the SSE-Sub-Committee to investigate this matter., taking into account the opinions expressed by delegations at PPR 11.

### FURTHER INFORMATION

For further information please contact: [imo@liscr.com](mailto:imo@liscr.com)

## PPR 11 – Summary of Major Decisions

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### Provisional list of draft resolutions and circulars

- Draft Revised tank cleaning additives guidance note and reporting form (for review by MEPC 82)
- Draft Guidance on Best Practice on Recommendatory Goal-Based Control Measures to Reduce the Impact on the Arctic of Black Carbon Emissions from International Shipping (for review by MEPC 82)
- Draft guidelines on recommendatory Black Carbon emission data collection, monitoring and reporting (for review by MEPC 82)
- Draft amendments to MARPOL Annex VI regulation 13 (for review by MEPC 82)
- Draft amendments to the NOx Technical Code (for review by MEPC 82)
- Draft guidelines for developing a local oil/hazardous and noxious substances marine pollution contingency plan (for review by MEPC 82)
- Draft guidelines on mitigation measures to reduce risks of use and carriage for use of heavy fuel oil as fuel by ships in Arctic waters (for review by MEPC 82)
- Recommendations for the Carriage of Plastic Pellets by Sea in Freight Containers (for review by MEPC 81)
- Draft IMO Guidelines on good practice relating to clean-up of plastic pellets from ship-source releases (for review by MEPC 82)