

MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 7

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REDUCTION OF GHG EMISSIONS FROM SHIPS

Comments on document MEPC 77/7/2 (Japan et al.)

Submitted by IACS

SUMMARY

Executive summary: This document comments on document MEPC 77/7/2 (Japan et al.) containing the draft amendments to the EEXI calculation guidelines and associated guidance to incorporate the in-service measurement method

Strategic direction, if applicable: 3

Output: 3.2

Action to be taken: Paragraph 10

Related documents: ISWG-GHG 8/2/Rev.1 and MEPC 77/7/2

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *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.2) and comments on document MEPC 77/7/2 (Japan et al.).

Background

2 MEPC 76 adopted amendments to MARPOL Annex VI to incorporate the EEXI and CII rating mechanism, together with the supporting guidelines including EEXI calculation guidelines and verification guidelines.

3 An alternative method using in-service performance measurements to determine V_{ref} was proposed in document ISWG-GHG 8/2/Rev.1 and considered by ISWG-GHG 8. Although a number of delegations expressed their interest in the concepts, the Group recommended that the proposals should be further examined soon after MEPC 76.

4 IACS appreciates the efforts made by the co-sponsors of document MEPC 77/7/2 in improving the approach of in-service performance measurements. Comparing it to the original proposal in document ISWG-GHG 8/2/Rev.1, IACS notes that several changes have been made, which result in an approach that resembles a light version of ISO 15016:2015, albeit not at the same level of detail.

5 In order to facilitate the discussion during MEPC 77 and the development of the guidance for in-service performance measurements, as set out in annex 3 to document MEPC 77/7/2, IACS is pleased to provide the below considerations.

Discussion and proposals

6 In table 3 of annex 3 to document MEPC 77/7/2, it is stated that speed trials should be performed at displacement and draught conditions, which are comparable to those of the delivery sea trials or model tests or assumed ballast conditions. Paragraph 3.5 of annex 3 to document MEPC 77/7/2 specifies that the in-service performance measurements should be performed at the EEXI draught condition, while paragraph 3.6 of the same allows adjustment/correction, so as other draught conditions can be accepted. IACS is of the view that "draught condition" may need to be further defined or clarified for consistency.

7 In case sea trial data, such as the ballast draught condition, is available, it is not clear how the results should be used to obtain the speed-power curve at the EEXI draught condition. It is suggested to provide further explanation or illustration for uniform implementation.

8 As stated in paragraphs 4.9 and 5.3, and appendices B and C, of annex 3 to document MEPC 77/7/2, fuel consumption during the in-service performance measurements should be measured, analysed and submitted, while the in-service measurements for fuel consumption is not accepted as a means to obtain SFC in EEXI calculation guidelines. Furthermore, this is not part of ISO 15016:2015 procedures either.

9 Paragraph 4.11 of annex 3 to document MEPC 77/7/2 states that the in-service performance measurement should be witnessed by the verifier, as far as practicable. IACS considers that the acceptance of the result of "in-service performance measurement", which are not witnessed by a verifier, should be further clarified. IACS opines that the absence of the verifier on board could be acceptable on the basis that the verification from a remote location is feasible, in principle. To ensure that the availability of data to the verifier, whether by witnessing and/or other means, is robust, IACS proposes the following modification* to paragraph 4.11:

"4.11 As far as practicable, the in-service performance measurement should be witnessed by the verifier. The verifier should be able to confirm that the in-service performance measurement was conducted in accordance with the agreed procedures."

Action requested of the Committee

10 The Committee is invited to consider the proposal contained in paragraph 9 and take action as appropriate.

* New insertions are underlined.