

MARINE ENVIRONMENT PROTECTION
COMMITTEE
61st session
Agenda item 5

MEPC 61/5/12
23 July 2010
Original: ENGLISH

REDUCTION OF GHG EMISSIONS FROM SHIPS

Consideration of a principle for alternate calculation or exemption of EEDI in ships with special circumstances

Submitted by Vanuatu

SUMMARY

Executive summary: This document is intended to clarify an issue raised at EE-WG 1 and is intended to describe a proposal for an exemption category to current, draft, EEDI calculation requirement

Strategic direction: 7.3

High-level action: 7.3.2

Planned output: 7.3.2.1

Action to be taken: Paragraph 12

Related documents: MEPC 61/5/3 and EE-WG 1/2/10

Introduction

1 Vanuatu participated in the discussions undertaken at the first Intersessional Meeting of the Working Group on Energy Efficiency Measures for Ships. At that session, Vanuatu proposed, for the consideration of the attending delegates, that an exemption be considered to the EEDI requirements for ships whose trade was critical, either economically or materially, to support small and/or remote island nations. This intervention was captured in paragraph 2.11.1 of the working group's report (MEPC 61/5/3).

2 The rationale behind the intervention involved a model in which a vessel could be acquired to support a remote island port with limited infrastructure and other issues that would otherwise cause the capacity of the vessel to be limited by design factors and the structure of the vessel increased by the need to be outfitted with self-loading and unloading appliances. A conjunction of design parameters of this sort would serve to decrease her capacity and increase vessel deadweight.

3 It should be noted that the current proposed formulation for the EEDI reference line, which would govern the vessel for the life and dictate levels of allowable fuel consumption, is based upon the simple premise that capacity is the definition of "benefit" of the types of vessels under consideration. A fairly concise discussion of this issue was presented in paragraphs 4 to 6 of document EE-WG 1/2/10 (Germany and Sweden).

Discussion

4 It should be clarified that the vessel types currently under discussion for implementation of EEDI requirements tend to be generally higher tonnage ranges, and the topic of certain tonnage or capacity thresholds has been introduced. It has been assumed that the intent of these thresholds is to effect a graduated implementation. A majority of attending delegations clearly intended for the proposed formulation to be applied, eventually, to all vessels of these types. Discussions have indicated that most delegates were of the impression that the EEDI formula for "other" vessel types might differ from the current model.

5 It should be pointed out that if the current formulation is used as projected, the net effect may well disproportionately, and negatively, impact traffic to nations, and not only island nations, with less developed port facilities, regardless of how remote they may be. The extent to which this negative impact may be the case should be considered now, because it likely may not be possible to affect the issue retroactively.

6 The Committee should consider now, if these regulations are intended to direct ship designers to focus entirely on maximizing cargo capacity. This could possibly have the unintended consequence of causing the mishaps of the future to be more serious than if smaller vessels had been involved.

7 A similar effect may occur in ship design for vessels with secondary missions that involve humanitarian purposes, such as disaster relief, oil spill response or search and rescue, since they too may involve appliances for self-unloading, oil recovery and or speed requirements. This point also involves determinations of benefit that fall outside the bare parameters of capacity.

8 Ameliorating the negative aspects of the current draft proposal is complicated because these less adequate port facilities may lie anywhere along a projected routing for a vessel under design. These inadequacies in infrastructure may well not lie in the ports of the vessel's own flag Administration. Designers and owners should be given an avenue with which to approach their Administrations and request either an exemption or a compensating factor in the EEDI calculation of the vessel.

Proposal

9 Vanuatu submits that the EEDI reference line should not be intended to penalize vessels designed for routes that call at ports that are remote, isolated or without the facilities of developed nations.

10 The most equitable way forward would be to include a compensating factor for vessels with design considerations of the nature discussed above. However, a real-world balancing effect is not likely to resolve the definitional issue that lies at the core of the current formulaic calculation of capacity being equated with benefit.

11 Therefore, Vanuatu believes a provision for an exemption of this requirement should be included in the proposed regulations.

Action requested of the Committee

12 The Committee is invited to consider the proposal and direct the working group as deemed appropriate.