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03 February 2020

MC(20)13

TO: MARINE COMMITTEE

Copy: All Full and Associate Members for Information

EEXI – REQUEST TO CO-SPONSOR

Action required: *Members are invited to review the documents attached at Annex and confirm their support to co-sponsor (or otherwise) to the undersigned by Thursday 6 February.*

Members will recall MC20(07) which invited comments on the third round of the draft documents regarding the EEXI. Japan has now circulated the final documents for submission to ISWG GHG 7 with an invitation to co-sponsor, these are:

- **Submission to ISWG GHG 7 proposing the EEXI, including regulatory amendment, attached at Annex A;**
- **Submission to ISWG GHG 7 providing EEXI guidelines, attached at Annex B; and**
- **Submission to ISWG GHG 7 providing the impact assessment and further information, attached at Annex C.**

The Secretariat expressed several concerns to the coordinator following round 3, particularly with respect to Ro-Ro vessels, container ships and engine power limitation. Some of these comments are addressed in revisions to V_{ref} . The former sigma has been replaced with a performance margin m , which is more equalized among the different ship types than the former sigma. This is intended to address concerns that sigma could have had a significant impact on certain ship types with large variation of ship speed, since the approximated ship speed will not be less than the average minus 1 knot. The EEXI proposal also now includes a review clause, which is compatible with the [3 year] review included in the draft operational measure proposal shared with Members in MC(20)12.

In response to comments questioning whether it was necessary to include the draft EPL guidelines within the EEXI proposal, it is considered to be important to include the guidelines since one of the principal matters discussed at ISWG GHG 6 and within the working group was application of power limitation. However, EPL is addressed in a separate annex from the EEXI to maintain a separation between

EEXI and EPL. The EEXI is a goal based technical measure, and EPL is only one potential tool which may be used to achieve the necessary EEXI value.

Although the supporting guidelines are proposed in submission 2 (Annex B), they can be further reviewed and revised since they will not be adopted until the amendments to the Convention are adopted. Therefore, there will be more sessions to discuss technical issues in the guidelines.

The Secretariat considers that the EEXI is a practical proposal which should allow IMO to finalize a short-term technical measure without delay. Whilst there are still some outstanding concerns with respect to technical details in the guidelines it is considered that the latest revisions mitigate risks to container and Ro-Ro vessels and the guidelines will be further discussed following finalization of the regulatory amendments. Therefore, the Secretariat is satisfied with the final submissions.

The coordinator has asked potential co-sponsors to confirm their willingness to co-sponsor by Tuesday 4 February. Recognising that this is not practicable for the Secretariat to seek confirmation from Members, Japan has kindly agreed to hold a place open until Friday 7 February for ICS to co-sponsor. Therefore, Members are requested to inform the undersigned (john.bradshaw@ics-shipping.org, copied to jade.smith@ics-shipping.org) of their support to co-sponsor the submissions by Thursday 6 February.

John Bradshaw
Technical Director

Enclosures:

Annex A - Submission to ISWG GHG 7 proposing the EEXI, including regulatory amendment

Annex B - Submission to ISWG GHG 7 providing EEXI guidelines

Annex C – Submission to ISWG GHG 7 providing further information for the impact assessment for the EEXI