TRIPARTITE 2023

SAFETY & DECARBONISATION: A REGULATORY PERSPECTIVE

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2023 IMO GHG Strategy

- Reduction in carbon intensity of international shipping by at least
 40% by 2030 compared to 2008.
- Uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources to represent at least 5%, striving for 10%, of the energy used by international shipping by 2030.
- Reach net-zero GHG emissions by or around, i.e. close to, 2050.
- Indicative Checkpoints for 2030 and 2040.

HOW TO GET THERE? 🚊



Image credit: Ricardo

HOW TO GET THERE? 🚊



Image credit: Shell LNG



Considerations for choice of fuel

- Cost CAPEX & OPEX
- Suitability to meet GHG reduction targets (company ESG, IMO etc.)
- Global availability
- Consistent quality
- SAFETY



STATUS QUO – CONVENTIONAL FUELS

- **MARPOL Annex VI** Regulation 18: Fuel oil availability and quality
- **SOLAS Chapter II-1**
 - Part F: methodology for alternative design and arrangements for machinery, electrical installations and low-flashpoint fuel storage and distribution systems.
 - **Part G**: requirements for ships using low-flashpoint fuels
- **SOLAS Chapter II-2** Regulation 4: Probability of Ignition



- **IGF Code** currently focusing on liquefied natural gas (LNG).
- IGC Code design and construction standards for all ships engaged in the carriage of liquefied gases.
- IBC Code international standard for the safe carriage in bulk by sea of dangerous chemicals and noxious liquid substances.

IMO WORK ON ALTERNATIVE FUELS 🚔

- IMO Sub Committee on Carriage of Cargoes and Containers (CCC)
 - Work item: Amendments to the IGF Code and development of guidelines for alternative fuels and related technologies.
 - CCC usually meets once every year. Work progressed through intersessional correspondence group.

IMO Maritime Safety Committee (MSC)

- Work item: Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels.
- MSC usually meets once every year. Work progressed through intersessional correspondence group.



- Interim guidelines adopted for
 - Methyl/Ethyl alcohols
 - Fuel Cells
 - Liquefied Petroleum Gas (LPG)
- Ongoing work on interim guidelines for
 - Hydrogen
 - Ammonia
 - Low FP oil fuels



- Good progress with guidelines for Hydrogen.
- Basis principles have been agreed, however many issues still to resolve for ammonia. It is likely that not all ship types could meet concepts like safety distances and safe havens.
- On low FP fuels work towards developing guidelines for using fuels with FP between 52°C and 60°C. Appropriate safety concepts still TBD.
- Other issues identified include the lack of arrangements for safe debunkering in ships powered by alternative fuels. Will need to be addressed in future work.



- Considering the critical need for guidelines on Hydrogen and ammonia, IMO has decided to establish a weeklong intersessional working group on alternative fuels along with CCC 10 in 2024.
- According to latest work plan interim guidelines on ammonia and hydrogen should be approved at MSC 109 (Dec 2024).
- Subsequent priority work includes development of mandatory instruments for methyl/ethyl alcohols and fuel cells.



- Important changes to IGC Code agreed vessels carrying cargos in the IGC code may use those cargos as fuels as long as they meet the specifications, which are;
 - Inot a cargo requiring 1G construction';
 - provides the same level of safety as natural gas;
 - takes into account relevant guidelines developed by the Organization; and
 - special consideration has been given by the Administration.

These changes would facilitate the use of ammonia cargo as fuel and are expected to come into force in 2028.



- To identify and update a list of low and zero GHG fuels and technologies, conduct a regulatory assessment for these fuels and technologies and identify and address safety obstacles and regulatory gaps.
- Work being progressed through an intersessional CG. Will report to MSC 108.

- Nuclear: Code of Safety for Nuclear Merchant Ships (A.491(XII)) to be reviewed?
- Batteries: SOLAS II-1 based on assumption that propulsion power by ICE – may need to be reviewed

- Work on fuel safety needs to address every aspect of fuel chain; production, blending, transport, bunkering, storage, processing and use.
- Marine fuel supply side is highly unregulated. Reluctance among major bunker States (USA, EU) to establish robust standards and enforcement on supply side.
- MARPOL defines fuel oil as "any fuel" but provisions on quality and safety tailor made for fossil derived fuels.

- IMO Member States open to control supply side for environmental compliance sustainability, LCA etc. Similar approach needed for safety of fuels.
- A Well-to-Wake approach is needed to ensure the safety ofships using alternative fuels.





Image credit: San Diego Union Tribune Archives

Remember, it only takes ONE incident!

THANK YOU



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