

Circular From NORTH

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MARPOL Changes To Tackle Carbon Emissions Now In Force

From 1 January 2023 vessels must start collecting data for the reporting of their annual operational carbon intensity indicator (CII) and CII rating, and at first survey after this time, verification of the calculated attained Energy Efficiency Existing Ship Index (EEXI).

Amendments to the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI entered into force on 1 November 2022.

The new rules require that as of 1 January 2023 all applicable vessels must start collecting data for the reporting of their annual operational carbon intensity indicator (CII) and CII rating, and at first survey after this time, verification of the calculated attained Energy Efficiency Existing Ship Index (EEXI).

EEXI

Existing ships of 400 GT and above will be required to calculate its **attained** Energy Efficiency Existing Ship Index (EEXI), which indicates its energy efficiency. The vessel must then meet a specific **required** EEXI, which is based on a required reduction factor to reduce its carbon emissions.

The vessel's attained EEXI and technical file is to be verified at the first annual, intermediate or renewal survey after 1 January 2023. This forms part of the scope of the International Air Pollution Prevent (IAPP) survey, whereupon the vessel is issued with an International Energy Efficiency Certificate (IEEC).

CII – Carbon intensity indicator

The IMO Carbon Intensity Indicator (CII) is an operational measure to tackle carbon dioxide (CO₂) emissions. It is applicable to ships of 5,000 GT and above, which aligns with the requirements on recording vessel fuel consumption in accordance with the IMO Data Collection System (IMO-DCS).

At the end of 2023 and the end of each following year, every applicable vessel of 5,000 gross tonnage and

above must calculate and report their attained annual operational CII for the calendar year (1 January to 31 December).

Operational CII Rating

The **attained** annual operational CII must be documented and verified against the **required** annual operational CII to determine the **operational carbon intensity rating**.

The rating can be A, B, C, D or E, indicating a major superior, minor superior, moderate, minor inferior, or inferior performance level, as shown below.



The methodology for calculating the ship's attained annual operational CII and the required annual operational CII must be included in the vessel's Ship Energy Efficiency Management Plan (SEEMP).

Corrective actions and incentives

A ship rated 'D' for three consecutive years or rated 'E' must develop a corrective action plan on how to achieve the required annual operational CII ('C' or above).

Administrations, port authorities and other stakeholders as appropriate, are encouraged to provide incentives to ships rated as A or B.

IMO Review Clause

The IMO will complete a review before 1 January 2026 on the effectiveness of the new regulations.

Consequences of non-compliance

It remains unclear what actions different port State control functions around the world will take on shipowners who have not arranged their SEEMP or are not dealing with their corrective actions. More will be announced in due course, but port State control detention may be a real threat to those who do not comply.

Source of Information: The North P&I Club

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