

INTERSESSIONAL MEETING OF THE  
WORKING GROUP ON REDUCTION OF  
GHG EMISSIONS FROM SHIPS  
4th session  
Agenda item 2

ISWG-GHG 4/2/3  
31 August 2018  
ENGLISH ONLY

**DEVELOPMENT OF A PROGRAMME OF FOLLOW-UP ACTIONS OF THE INITIAL IMO  
STRATEGY ON REDUCTION OF GHG EMISSIONS FROM SHIPS**

**Action Plan for implementing the IMO GHG Strategy and candidate measures**

**Submitted by Antigua and Barbuda, Kenya, Marshall Islands, Palau,  
Solomon Islands, Tonga, Tuvalu**

**SUMMARY**

*Executive summary:* This document comments on the *Initial IMO Strategy on reduction of GHG emissions from ships* in regards to candidate measures and priorities for implementation, and an Action Plan to result in implementation of emissions reduction measures prior to 2023

*Strategic direction,  
if applicable:* 3

*Output:* 3.2, 3.4, 3.5, 3.6 and 3.7

*Action to be taken:* Paragraph 12

*Related documents:* MEPC 72/WP.7, MEPC 72/17, MEPC 72/7/2; ISWG-GHG 3/2/4, ISWG-GHG 3/2/8, ISWG-GHG 3/2/9 and ISWG-GHG 3/2/13

**Context**

1 This document comments on resolution MEPC.304(72) on *Initial IMO Strategy on reduction of GHG emissions from ships* (hereinafter the Initial Strategy), and in specific regards to its Section 4 "List of candidate short-, mid- and long-term further measures with possible timelines and their impacts on States".

**Candidate measures**

2 It is the view of the co-sponsors that the highest priority be accorded to finalization of an Action Plan for the implementation of measures, in particular including committed timelines for implementing agreed short-term measures. In regards to the short-term measures listed in paragraph 4.7 of the Initial Strategy, the co-sponsors record the following positions.

3 In general terms the list of candidate measures is supported with the following notes:

- .1 4.7.1: the co-sponsors support an ambitious strengthening of the current energy efficiency provisions (such as EEDI and SEEMP) to ensure these contribute significantly to the levels of ambition agreed to in the Initial Strategy;
- .2 4.7.4: the analysis of speed reduction is highly supported and the co-sponsors ask for an ambitious timeframe to be set for completion of this work, including impacts on SIDS and LDCs; and
- .3 4.7.6: National Action Plans (NAPs) as voluntary measures are also strongly supported and the co-sponsors note that Marshall Islands has already endorsed such a NAP, the Micronesia Center for Sustainable Transport (MCST) Framework; that Fiji is currently preparing a Low Emissions Development Strategy (LEDS) for the maritime sector; and that further voluntary NAPs are anticipated for other Pacific SIDS. The co-sponsors request that IMO be cognizant of these existing initiatives and the precedent set by these initiatives in development of supporting tools such as guidelines and technical assistance, and provide ongoing support to these existing initiatives as a matter of priority.

4 In regards to the research and development requirements indicated in paragraph 4.7.9, the co-sponsors request that such research be targeted at all levels of the shipping industry and, in particular, smaller scale vessels typical of those servicing the most vulnerable: SIDS and LDCs. The co-sponsors would like to see such States fairly represented on any research board and also advocate for the establishment of a technical body to advise such a board. Such a permanent technical body should be independent and should be made up of individual experts from the fields of science, policy, engineering and economics. Members would be appointed by IMO but not represent any IMO delegation and, to maintain public confidence, the body will need to operate with transparency. The value of an independent entity to provide expert advice and guidance is demonstrated, for example, by the Technical Economic Assessment Panel to the Montreal Protocol.

5 Paragraph 4.7.12 is supported and the co-sponsors acknowledge the work done by IMO to date. The co-sponsors request independent evaluation of the technical and operational measures undertaken to date to determine effectiveness. This evaluation, undertaken periodically, will inform on what should be adopted across the board.

6 The co-sponsors support paragraph 4.7.13 and ask for the Working Group to recommend to the MEPC 73 to acknowledge that robust and independently verifiable work is required as an urgent priority to ascertain the potential impact on SIDS and LDCs of all proposed GHG emissions reduction measures. The co-sponsors note that the lack of baseline data and analysis has significantly hampered any efforts to quantify such impacts and to prepare counter measures in the past.

7 The co-sponsors recall previous submissions that requested that robust debate and analysis of Market Based Measures (MBMs) be included within the candidate short term measures and a timeframe for their implementation be included in the Action Plan. There is an obvious need for financial incentives, research and development investment, and regulation, to achieve the levels of ambition in the Initial Strategy. The co-sponsors strongly request that the preparatory work in agreeing MBMs be an immediate and high priority.

8 The co-sponsors wish also to record their preference in regards to MBMs; namely an easily implementable, transparent, carbon tax or levy on bunkers. The level of tax or levy set must be regularly reviewable and the co-sponsors anticipate this increasing over time. While the co-sponsors can agree that the initial revenue generated could be targeted primarily at research and development for the industry and compensation for the impact on SIDS and LDCs from measures adopted, this should not establish a precedent that would restrict the broader use of such revenues for mitigating or adapting to the effects of climate change by the most vulnerable. The revenue could be administered under a structure such as the International Oil Pollution Compensation Fund.

9 The co-sponsors note and appreciate the inclusion of Section 5 in the Initial Strategy regarding technical cooperation. However, the co-sponsors note also that parallel initiatives such as the Marshall Islands' MCST Framework and the Fiji LEDS were initiated outside of such cooperation, and also require acknowledgement and ongoing resourcing. While current initiatives such as GloMEEP and GMN/MTCC network are welcomed, the co-sponsors note they are clearly insufficient in scope and scale to address the paradigm shift needed and the level of support needed by member States such as SIDS and LDCs.

10 The co-sponsors note their ongoing proactive and positive contribution to the current Roadmap process and remain committed to maintaining such positive contribution to the best of their capacities throughout the process.

11 The co-sponsors also note the positive message that adoption and implementation of a clear and decisive Action Plan that results in emissions reductions prior to 2023 will send, and further encourage increased commitments to reducing emissions in other forums such as UNFCCC.

#### **Action requested of ISWG-GHG 4**

12 The Group is requested to consider the comments in this document and take action as appropriate and in particular to request the Committee to initiate work on those measures which can achieve emissions reduction prior to 2023 and some of the measures listed in the Initial Strategy (MBMs, NAPs, baseline research to determine impacts of measures on SIDS and LDCs, and enhanced support for existing initiatives) well in advance of 2023 and to adopt an Action Plan and firm timelines (such as those proposed in documents MEPC 72/7/2, ISWG GHG 3/2/9 and ISWG GHG 3/2/13) to achieve this.

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