# Marine Policy & Regulatory Affairs (MPRA) Committee

**Minutes** of a meeting of the Association's Marine Policy & Regulatory Affairs (MPRA) Committee held on 6<sup>th</sup> February 2025 from 13.30 via videoconference

# 1 Competition law compliance policy

The IMCA Competition Law Compliance Policy, which had been circulated with the meeting agenda, was drawn to the attention of all present.

## 2 Welcome and attendance

1) The chair welcomed members to the meeting. Apologies for absence were recorded, with the latest meeting attendance now as follows:

| Name                           | Company                       | 6 February<br>2025 | 12 December<br>2024 | 8 October<br>2024 | 30 April<br>2024 |
|--------------------------------|-------------------------------|--------------------|---------------------|-------------------|------------------|
| Dennis Janssen<br>(Vice Chair) | Allseas                       | Attended           | Attended            | Attended          | Attended         |
| Peter McCombie                 | TechnipFMC                    | Attended           | Attended            | Attended          | Attended         |
| Aurelien Verrier               | Saipem                        | Absent             | Absent              | Absent            | Attended         |
| Bert Devos                     | Jan de Nul                    | Attended           | Attended            | N/A               | N/A              |
| Eugene van Dodeweerd           | Boskalis                      | Attended           | Absent              | Absent            | Absent           |
| Evan McLaughlin                | McDermott                     | Absent             | Attended            | Attended          | Attended         |
| Frederic Siohan                | Bourbon                       | Attended           | Attended            | Attended          | Attended         |
| Gary Ritchie                   | Subsea 7                      | Attended           | Attended            | Attended          | Attended         |
| Gerd Van de Merlen             | DEME Group                    | Attended           | Attended            | Attended          | Attended         |
| Iris de Vos-Hermeler           | Fugro                         | Absent             | Absent              | Absent            | Absent           |
| Joost Rotgans                  | Heerema Marine<br>Contractors | Absent             | Absent              | Absent            | Apologies        |
| Kyle Pemberton                 | Seacor Marine                 | Attended           | Attended            | Attended          | Attended         |
| Liesbeth den Haan              | Van Oord                      | Attended           | Absent              | Absent            | Apologies        |
| Matt Thomas                    | Bibby Marine                  | Attended           | Attended            | Attended          | Attended         |
| Phil Moss                      | Bibby Marine                  | Absent             | Attended            | Attended          | Attended         |
| Remko Kloos                    | FUGRO                         | Resigned           | Absent              | Absent            | Attended         |
| Saverio La Forgia              | Saipem                        | Attended           | Absent              | Absent            | Absent           |





# 3 Minutes of the previous meeting

#### 3.1 Approval of the minutes of the previous meeting

1) The minutes of the meeting held on the 12<sup>th</sup> December 2024 were agreed and were duly signed as an accurate record by the Vice Chair.

#### 3.2 Matters arising from the minutes not covered by the agenda

- 1) There were no items under this agenda item.
- 4 Update on IMCA's submission to IMO on the outcome of our fuel consumption data collection exercise and conclusions on a carbon intensity metric for the sector offshore sector
  - 1) Margaret Fitzgerald advised that the Committee's document on the outcome of work to assess the effectiveness of Proxies A and B as suitable metrics for assessing carbon intensity of the offshore sector had been published by IMO as MEPC 83/6/4 and would be considered by MEPC 83 (April 7 11) under Agenda Item 6 on Air Pollution.
  - 2) The outcome of this meeting would be reported to a future session of the Committee.

**Action: Margaret Fitzgerald** 

# 5 IP Code – Update on submissions to IMO and UK IP Code consultation process

- Margaret Fitzgerald updated the Committee on the IMCA's submissions to IMO on the IP Code.
- 2) The Committee recalled that IMCA had prepared 2 documents for consideration at the January session on IMO's Sub-Committee on Ship Design & Construction (SDC):
  - SDC 11/4 on Guidance/Explanatory notes to the IP Code which proposes that IMCA's Guidance document REG 005 be used as the basis of developing an IMO Guidance document; and
  - b) SDC 11/4/1 requesting the SDC Sub-Committee to keep the agenda item open to allow for the second phase of work on the IP Code to be undertaken.
- 3) With regard to IMCA's submission SDC 11/4, the Committee was informed that, during SDC 11, the following views were expressed:
  - .1 It was premature to initiate the development of guidance on the IP Code at this stage. The Code had entered into force on 1 July 2024 and it would be preferable to wait for more experience to be gained before initiating the process for drafting the guidance.



- .2 Due to the recent adoption of the IP Code, it would be important to develop guidance to assist in the implementation and adequate application of its provisions, following some experience, in order to assist all relevant stakeholders.
- In light of the above, SDC 11 agreed not to develop related guidance to accompany the implementation of the IP Code at this stage.
- With regard to IMCA's submission SDC 11/4/1, despite acknowledging the need for further work and in the absence of concrete proposals, in accordance with the draft revision of the Committees' method of work SDC 11 agreed that the work under the output had been completed and therefore the work item was removed from the agenda.
- Despite the disappointing decisions by IMO, the Committee agreed that IMCA should continue to monitor the implementation of the IP Code within Member States so that IMCA can become the central knowledge hub on this Code. IMCA should use this information to develop a register of issues reported which can be used for engagement with Flag States on members behalf in the future.
- 6) Dennis Janssen proposed that the Committee should develop an Information Note on the implementation of the IP Code requesting input from members and stakeholders to enable IMCA to engage more effectively with Flag States.

#### **UK Public Consultation on the IP Code**

- 7) The Committee recalled that the UK Government had opened a public consultation process on the UK's Merchant Shipping (safety measures for ships carrying Industrial Personnel and Special Personnel) Regulations, 2025 which will close on 17<sup>th</sup> February. A small Working Group established under MPRA was drafting IMCA's response to the consultation questions.
- 8) Further updates on this would be provided to the Committee in due course.

**Action: Committee Members/Margaret Fitzgerald** 

#### **6** UK ETS Consultation process

- 1) The Committee recalled that the UK Government had opened a public consultation on the UK Emissions Trading Scheme which closed on the 23 January.
- 2) Further updates on this would be provided to the Committee in due course.

**Action: Committee Members/Margaret Fitzgerald** 

#### 7 Granularity of data for IMO's DCS

1) The Committee was advised that MEPC.385(81) on:

Low-flashpoint fuels and other fuel oil related issues, marine diesel engine replacing steam system, accessibility of data and inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS))

- had been adopted on the 22nd March 2024, deemed to have been accepted on 1 February 2025 and will enter into force on 1 August 2025.
- 2) The Committee was informed that, in support of these amendments, the Guidelines on the Development of SEEMP (Resolution MEPC.388(81), as amended by



- MEPC.395(82) and the Guidelines for Administration Verification (Resolution MEPC.389(81) were revised.
- 3) It was noted that MEPC 82 also approved the Guidance on the Application, providing relevant interpretations (see mepc.1/Circ.913).
- 4) The Committee agreed it would be good to gather further information from Members on this issue in order to have a better understanding of member's experiences and produce relevant guidance in due course.

**Action: Committee Members** 

#### 8 US Policy

- 1) The Committee recalled that at its meeting in December 2024 it had discussed the latest version of the USCG's Marine Safety Information Bulletin 13-23, dated 23rd December 2024 which requires vessels to install surveillance cameras in an effort to reduce instances of sexual assault and sexual harassment (SASH) to non-domestic vessels operating in US waters.
- 2) It was noted that Members raised several questions about the scope of application of the requirements and Margaret Fitzgerald wrote to the USCG seeking clarification, on behalf of IMCA, and subsequently, the Committee developed an Information Note on the subject.
- 3) In light of the change of Administration in the United States, the Committee agreed to keep close attention on further policy developments there which would affect the sector.

**Action: Committee Members** 

#### 9 Committee objectives for 2024/2025

- 1) The Committee recalled that it had established its objectives under 3 separate headings:
  - a) General
  - b) Work on the Industrial Personnel Code (IMO)
  - c) Decarbonisation of the marine industry (IMO)
  - d) STCW Review (IMO).
- 2) Recognising that these work streams are ongoing, the Committee had agreed to set these Objectives for both 2024 and 2025 subject to review.
- 3) In addition to the list above the Committee agreed to add:
  - a) Granularity of DCS data
  - b) US policy developments on the existing list of Objectives

as well as including an amended item for the IP Code based on the outcome of SDC 11 (see paragraphs 4 and 5 under Agenda 5 above).

**Action: Committee Members** 



#### 10 Election of a new Committee Chair

- 1) The Committee recalled that following the resignation of Angelo Tossio, Kyle Pemberton of Seacor Marine had put his name forward for the role of Chair of the Committee and agreed that Kyle would be elected to the position unless any objections were raised.
- 2) Unfortunately Kyle was not able to attend the Committee's last meeting so it was not possible to proceed with his election so the Committee agreed that he would be elected as Chair at the Committee's first meeting in February 2025 unless any objections were raised.
- 3) The Committee unanimously elected Kyle Pemberton (Seacor Marine) as its Chair. Kyle will Chair future sessions of the Committee.

#### 11 MPRA Event in 2025

- The Committee recalled that an MPRA event had been included in the budget for October 2025 in the Netherlands following closely after the Extraordinary Session of the Marine Environment Protection Committee (MEPC) which will adopt the Mid-Term Measures approved by MEPC 82 in April 2025. Members would get the opportunity to be involved in the planning of this event which will commence in Spring 2025.
- 2) Further discussion will take place at the Committee's next meeting.

#### 12 Any Other Business

#### Committee engagement at IMO

- Margaret Fitzgerald reminded the Committee that they are welcome to attend any IMO meeting. Members just need to let her know and she can arrange for authorisation.
- 2) Kyle Pemberton advised the Committee that he was planning to attend MEPC 83 in April 2025.

## 13 Date and location of next meetings

The Committee agreed to schedule all the meetings for 2025 at its's next meeting.
 Margaret Fitzgerald will liaise with the Chair and Vice Chair to look at the scheduling and propose them to the Committee at its next meeting.

Action: Margaret Fitzgerald

Dennis Janssen

30 May 2025

Signed as a true record

Name

Date



#### **ANNEX 1**

#### **AGENDA FOR THE MEETING**

# **Agenda**



- 1. Welcome & apologies for absence
- 2. Competition Law Compliance Policy
- 3. Adoption of the Minutes of last meeting 12th December 2024
- 4. Update on IMCA's submission to IMO on the outcome of our fuel consumption data collection exercise and conclusions on a carbon intensity metric for the sector offshore sector
- 5. IP Code Update on the outcome of IMO's SDC Sub -Committee on the IP Code and UK IP Code consultation process
- 6. UK ETS Consultation process
- 7. Granularity of data for IMO's DCS
- 8. Changing US Policy
- 9. Committee Objectives for 2024/2025 and achievements in 2024
- 10. Election of a new Committee Chair
- 11. MPRA Event in 2025
- 12. Any Other Business
- 13. Meeting dates for 2025

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6 February 2025