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Agenda item 11

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**FOLLOW-UP WORK EMANATING FROM THE ACTION PLAN TO ADDRESS
MARINE PLASTIC LITTER FROM SHIPS**

Report of the Working Group

General

1 The Working Group on Marine Plastic Litter from Ships met from 27 to 29 January 2025, and was chaired by Ms. Annalisse Skelton (Australia).

2 The meeting was attended by delegations from the following Member Governments:

ARGENTINA	LIBERIA
AUSTRALIA	MALAYSIA
BAHAMAS	MARSHALL ISLANDS
BELGIUM	MEXICO
BRAZIL	NETHERLANDS (KINGDOM OF THE)
CANADA	NEW ZEALAND
CHILE	NIGERIA
CHINA	NORWAY
COLOMBIA	PALAU
CYPRUS	PANAMA
DENMARK	PAPUA NEW GUINEA
ECUADOR	PHILIPPINES
EGYPT	POLAND
ESTONIA	QATAR
FINLAND	REPUBLIC OF KOREA
FRANCE	RUSSIAN FEDERATION
GERMANY	SAUDI ARABIA
GREECE	SINGAPORE
ICELAND	SOUTH AFRICA
INDIA	SPAIN
INDONESIA	SWEDEN
IRAN (ISLAMIC REPUBLIC OF)	THAILAND
IRELAND	TÜRKİYE
ITALY	UNITED ARAB EMIRATES
JAPAN	UNITED KINGDOM
LATVIA	UNITED STATES

by representatives from the following Associate Member of IMO:

HONG KONG, CHINA

the following representative from United Nations specialized agencies:

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS (FAO)

by observers from the following intergovernmental organizations:

EUROPEAN COMMISSION (EC)

MARITIME ORGANISATION OF WEST AND CENTRAL AFRICA (MOWCA)

and by observers from the following non-governmental organizations:

INTERNATIONAL CHAMBER OF SHIPPING (ICS)

INTERNATIONAL ORGANIZATION FOR STANDARDIZATION (ISO)

BIMCO

INTERNATIONAL ASSOCIATION OF CLASSIFICATION SOCIETIES (IACS)

EUROPEAN CHEMICAL INDUSTRY COUNCIL (CEFIC)

FRIENDS OF THE EARTH INTERNATIONAL (FOEI)

CESA

INTERNATIONAL GROUP OF PROTECTION AND INDEMNITY ASSOCIATIONS

(P & I CLUBS)

DANGEROUS GOODS ADVISORY COUNCIL (DGAC)

CRUISE LINES INTERNATIONAL ASSOCIATION (CLIA)

WORLD WIDE FUND FOR NATURE (WWF)

INTERNATIONAL MARINE CONTRACTORS ASSOCIATION (IMCA)

INTERNATIONAL TRANSPORT WORKERS' FEDERATION (ITF)

WORLD COATINGS COUNCIL

WORLD SHIPPING COUNCIL (WSC)

CLEAN SHIPPING COALITION (CSC)

INUIT CIRCUMPOLAR COUNCIL (ICC)

INTERNATIONAL POLLUTANTS ELIMINATION NETWORK (IPEN)

Terms of reference

3 Taking into account comments and decisions made in plenary, the Working Group was instructed to:

with regard to the review of the Action Plan to Address Marine Plastic Litter from Ships:

- .1 conduct a review of the Action Plan on marine plastic litter from ships, taking into account information in documents PPR 12/11/8, PPR 12/11/11, PPR 12/INF.14, MEPC 82/8, MEPC 82/8/3, MEPC 82/8/4, MEPC 81/8, MEPC 81/8/1, PPR 10/13/1, PPR 10/13/2, PPR 10/13/4, PPR 10/13/8, PPR 10/INF.11 and MEPC 79/INF.13, as appropriate;
- .2 as part of its review of the Action Plan:
 - .1 develop text for a specific action concerning the development of mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers; and

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- .2 consider the appropriateness of incorporating the proposals in document MEPC 80/8 into the draft revised Action Plan, taking into account the comments in document PPR 11/13/9, and advise the Sub-Committee accordingly;
 - .3 prepare an updated grouping of short-, mid-, long-term and continuous actions of the Action Plan using annex 1 to the *Strategy to address marine plastic litter from ships* (resolution MEPC.341(77)) as a basis;

with regard to reducing the environmental risk of the maritime transport of plastic pellets:

- .4 as a first step of the analysis of the potential mandatory instruments that could be amended and the associated implications, compile a table of all documents submitted to the Sub-Committee or MEPC relating to amendments to mandatory instruments and include references to identified advantages and limitations of each approach, as well as potential impacts (e.g. on production practices, the supply chain, transport costs, and harmonization of intermodal transport requirements) to inform future discussions on the most appropriate legal framework for introducing mandatory measures;
- .5 consider what further information may be required to complete the analysis and advise the Sub-Committee accordingly;
- .6 if time permits, further consider documents PPR 12/11/1, PPR 12/11/2, PPR 12/11/3, PPR 12/11/4, PPR 12/11/5, PPR 12/11/6, PPR 12/11/7, PPR 12/11/9, PPR 12/11/10, PPR 11/13/1, PPR 11/13/3, PPR 11/13/7, PPR 11/13/8, PPR 11/13/10 and PPR 11/13/12 with regard to the appropriate instruments that could form the legal basis for mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers;

with regard to reporting the loss or discharge of fishing gear as provided for in regulations 7.1.3 and 7.1.4 of MARPOL Annex V:

- .7 agree to the data to be reported to IMO to meet objectives 1 to 3 of the IMO database (as set out in paragraph 21 of document PPR 11/13) that were agreed by PPR 11, including consideration as to whether the additional data identified in paragraph 22 of document PPR 12/11 should be included, and advise the Sub-Committee accordingly;
- .8 if time permits, further consider whether additional metrics should be reported to IMO regarding the amount of gear lost, the issue of aggregation and anonymization, and the flow of reporting, taking into account the relevant paragraphs of and annex to document PPR 12/11;
- .9 consider the need for the establishment of a correspondence group and develop draft terms of reference, as appropriate; and

with regard to reporting to plenary:

- .10 submit a written report to plenary by Friday, 31 January 2025.

Review of the Action Plan to Address Marine Plastic Litter from Ships

General considerations

4 As instructed by the Sub-Committee, the Working Group proceeded to conduct a review of the Action Plan to Address Marine Plastic Litter from Ships (the Action Plan). In this regard, the Group agreed the outcome of the review would be the draft 2025 Action Plan to Address Marine Plastic Litter from Ships (2025 Action Plan), with a view to adoption by MEPC 83 through an MEPC resolution.

5 The Group agreed that any actions deemed to have been completed during the review would be recorded in an appendix to the draft 2025 Action Plan in order to capture the work completed to date and to assist in any future monitoring of the effectiveness of completed actions.

6 With regard to the expected time frame for each action, the Group recalled the instructions of the Sub-Committee to prepare an updated grouping of short-, mid-, long-term and continuous actions of the Action Plan using annex 1 to the *Strategy to address marine plastic litter from ships* (the Strategy, resolution MEPC.341(77)) as a basis.

7 The Group also recalled that the definitions of short-, mid-, long-term and continuous actions were set out in paragraph 4.1 of the Strategy, namely:

- .1 actions that can be progressed now by relevant sub-committees, which could be referred to as short-term actions;
- .2 actions that may be reliant on the outcomes of the IMO Study on marine plastic litter, or other relevant research, in order to progress, which could be referred to as mid-term actions;
- .3 actions which require concrete proposals to the Committee in order to progress, and could therefore be considered long-term actions; and
- .4 actions which would continuously be addressed over the life of the Action Plan.

8 In this connection, the Group also agreed that the time frame for each action should replace the "Priority" column in the draft 2025 Action Plan.

9 With regard to the inclusion of additional actions, the Group recalled the agreement of the Sub-Committee that any proposals for new work should include a well-defined scope, a robust justification and concrete outcomes. Such proposals would be submitted to MEPC, to be reviewed by the Committee with a view to instructing the Sub-Committee to begin work on the proposal, for inclusion in a future revision of the draft 2025 Action Plan following the next review.

10 The Group also recalled that this agreement was aligned with the agreement of MEPC 73 that no work would be requested of sub-committees prior to the submission of follow-up proposals and commenting documents by interested Member States and international organizations, with instructions to undertake work only on actions for which a well-defined scope of work had been developed (MEPC 73/19, paragraph 8.17).

11 The Group conducted a paragraph by paragraph review of the Action Plan, and in the course of the review, inter alia:

- .1 updated the background information to reflect the adoption of the Action Plan (MEPC.310(73)), the IMO OceanLitter Programme and the Intergovernmental Negotiating Committee to develop an international legally binding instrument on plastic pollution, including in the marine environment (INC);
- .2 updated the objective to reflect the addition of an appendix in the draft 2025 Action Plan to record actions that had been completed since the adoption of the initial plan; and
- .3 combined sections 3 (time frames) and 5 (review and evaluation) to concisely set out the time frames used for the expected completion of the actions and the review period for the draft 2025 Action Plan.

Specific actions

12 The Group proceeded to conduct a review of the individual actions, as detailed in the following paragraphs. Action numbers refer to the numbers in the initial Action Plan adopted through resolution MEPC.310(73).

13 With regard to action 1, the Group agreed to retain both elements of the action. Having noted that work could not progress on the first element of the action until the entry into force of the Cape Town Agreement, the Group also agreed that this element should be a mid-term measure. In relation to the second element, the Group agreed that this element should be a separate action to allow work to progress continuously.

14 During consideration of action 2, the Group recalled the agreement of MEPC 78 to develop a goal-based requirement under MARPOL Annex V for the mandatory marking of fishing gear and the instruction to the PPR Sub-Committee to develop draft amendments to MARPOL Annex V and associated guidelines accordingly.

15 Having noted support in plenary for the proposal in document PPR 12/11/8 (Canada) regarding the text of the action, the Group considered additional wording proposed by the Chair which recognized the decision of MEPC 78 and would take into account both existing guidance/measures and any that might be developed in the future. In this regard, the Group agreed on text for the action which highlighted the goal of avoiding duplication between mandatory goal-based measures under MARPOL Annex V and those under the purview of another organization.

16 The Group noted that proposals for draft amendments to MARPOL Annex V and associated guidelines were needed to progress the work and consequently assigned a time frame of mid-term.

17 During consideration of action 3, the Group recalled the instruction of the Sub-Committee to consider the appropriateness of incorporating the proposals in document MEPC 80/8 into the draft 2025 Action Plan, taking into account the comments in document PPR 11/13/9, and advise the Sub-Committee accordingly. Having noted the complementary nature of the existing action and the proposal in document MEPC 80/8 for a ship-specific fishing gear management plan, the Group agreed on both the wording for the revised action and that it should be considered a short-term action.

18 The Group retained action 4 with minor editorial amendments to the action and no change to the time frame (short-term).

19 With regard to actions 5 and 6, the Group agreed to mark these actions as complete, on the basis of the knowledge products developed by the GloLitter Partnerships Project described in document MEPC 82/8 (Secretariat).

20 Having recalled the amendments to MARPOL Annex V setting the threshold for carrying a garbage record book to 100 GT (down from 400 GT), adopted through resolution MEPC.360(74), the Group agreed that both actions 7 and 9, with identical text but under different outcomes, should be considered complete.

21 In relation to action 8 concerning the enforcement of MARPOL Annex V and port State control procedures for fishing vessels, the Group agreed to amend both elements of the action with "if appropriate" in order to not pre-empt the work of the III Sub-Committee. Noting that the III Sub-Committee had invited proposals on this matter, but that none had been received to date, the Group agreed to assign a time frame of mid-term.

22 The Group recalled that MSC 108 had adopted amendments to SOLAS chapter V (Safety of navigation) requiring the master of every ship involved in the loss of freight container(s) to communicate the particulars of such an incident to ships in the vicinity, to the nearest coastal State, and also to the flag State which would be required to report the incident to IMO (resolution MSC.550(108)). The Group also recalled that MEPC 82 had adopted associated amendments to Protocol I of MARPOL (resolution MEPC.384(81)).

23 In light of these amendments, the Group agreed that actions 10 and 11 should both be considered complete.

24 During consideration of action 12, the Group considered whether the action should be retained, and if so, whether liability for plastic consumer goods lost at sea from ships should be included. Several delegations expressed concerns with the action, including:

- .1 that liability matters were outside the remit of MEPC and PPR;
- .2 potential overlap with articles of the plastics treaty being negotiated by INC; and
- .3 with specific regard to plastic pellets, that an instrument for mandatory measures had not yet been agreed.

25 While these delegations expressed the view that the action should be deleted in its entirety, most delegations that spoke supported the retention of this action. These delegations expressed the views that the intention of the action was to cover all plastic goods, not just plastic pellets, and there was a precedent for liability to be taken into consideration by IMO conventions including, inter alia, the Nairobi Wreck Removal Convention and the International Convention on Salvage. Further, these delegations recalled the definition of a long-term action, and expressed the view that this time frame would be appropriate for this action because concrete proposals would be needed to progress the work further.

26 The Group noted general support for a text proposal rewording the action to reflect the uncertainty of whether responsibility and liability should be addressed, with the added inclusion of "if appropriate" for liability for consumer goods lost at sea from ships. Subsequently, the Group agreed to the reworded text as a long-term action.

27 The Group also noted the views expressed by one delegation that, in light of the concerns expressed in paragraph 24 above, the action should be deleted entirely or, if retained, kept in square brackets in the final text until further consideration could be given by the relevant body of IMO.

28 With regard to action 13, and having agreed to retain the action with no amendments, the Group also agreed that it should be a mid-term action to reflect the request for proposals to be submitted to the III Sub-Committee.

29 The Group considered actions 14 and 15 relating to port reception facilities; the Group considered the objectives of the two actions and whether they should be retained separately or combined into a single action. Having recognized that action 14 related to requirements for port reception facilities themselves, while action 15 related to requirements for ships to deliver garbage to port reception facilities, the Group agreed to retain them as separate actions in order to preserve the objective of each action. The Group also agreed that both actions should be considered mid-term actions.

30 Having noted concerns regarding the applicability of requirements to accept fishing gear to facilitate reuse or recycling to ports that do not receive fishing vessels, the Group agreed to add "if appropriate" to the text of action 14.

31 On the basis of the related knowledge products prepared under the GloLitter Partnerships Project, the Group agreed to consider action 16 complete.

32 With regard to action 17, the Group considered whether the first element encouraging Member States to effectively implement their obligation under MARPOL Annex V regarding reception facilities should be retained following the issuance of MEPC.1/Circ.893. Having recognized both that the intent of the action had been completed, and that it was important to call on Member States to fulfil their obligations in this regard, the Group agreed that this element should be moved from the actions to the adopting resolution.

33 The Group agreed to reorder the third and fourth elements of action 17 to keep the elements related to port waste management plans together. The Group also agreed that the fifth element regarding the work of LC/LP being taken into account was not necessary given the existing reporting between MEPC and LC/LP.

34 Having finalized the text of this action, the Group agreed that it should be considered a mid-term action.

35 During consideration of action 18, the Group agreed that the existing action was complete, as the impact on SIDS and remote locations had been considered under the output on "Development of necessary amendments to MARPOL Annexes I, II, IV, V and VI to allow States with ports in the Arctic region to enter into regional arrangements for port reception facilities". Notwithstanding the completion of this output, the Group recognized that additional work might be necessary to improve regional arrangements for SIDS, and agreed that if further work in this regard were to be identified, a proposal should be brought to a future session of MEPC.

36 With regard to action 19, the Group agreed to slightly amend the action to reflect the renaming of the Global Partnership on Plastic Pollution and Marine Litter and to make this a continuous action.

37 The Group agreed that action 20 should be considered complete following the adoption of the new STCW-F Code by MSC 108.

38 Having noted that work on both elements of action 21 was under way, the Group considered whether to retain these elements. In this regard, the Group agreed to retain the first element until the conclusion of the work undertaken by the GloLitter Partnerships Project with respect to the preparation of relevant amendments to the Model Course "Marine Environmental Awareness 1.38". The Group then agreed to redraft the second element to reflect the current status of the comprehensive review of the STCW Convention and Code.

39 Subsequently, the Group agreed that this action should be considered a short-term action.

40 The Group agreed to retain action 22 with no amendments to the action or the time frame (short-term).

41 With regard to action 23, the Group considered if the action had been completed on the basis of the issuance of MEPC.1/Circ.894 on *Sharing of results from research on marine litter and encouraging studies to better understand microplastics from ships*. Having recognized the value in continuing to encourage research on the issue of marine plastic litter from ships, to be shared in the context of the draft 2025 Action Plan, the Group made slight adjustments to the action to provide more specificity and agreed to retain it as a continuous action.

42 The Group also considered whether wording was necessary to ensure that the research shared was robust and of high quality to inform actions at IMO. In this connection, the Group agreed that while additional wording would not change the intent of any research submitted, removing the word "any" in the phrase "any scientific research" might narrow the scope of the action in line with the intent.

43 During consideration of action 24 relating to the IMO Study on marine plastic litter, the Group recalled the outcome of MEPC 79, namely the invitation for submissions which could, inter alia, identify priority areas to be addressed by sub-projects or propose revised terms of reference for the IMO Study on marine plastic litter. The Group agreed to reword the action to reflect the current status of the IMO Study and the outcome of MEPC 79.

44 The Group also agreed that this should remain a short-term action, as the definition for mid-term action included a provision for actions that may be reliant on the outcomes of the IMO Study on marine plastic litter.

45 Having recognized the value in continuing to invite Member States and international organizations to undertake studies related to microplastics from ships, the Group agreed that the text in action 25 would be better placed in an operative paragraph of the adopting resolution, rather than as an action.

46 With regard to action 26, the Group recalled that Member States and international organizations had been invited to provide relevant information to the Secretariat, for inclusion in the regulatory framework matrix (MEPC 74/8, annex 3), with a view to maintaining the matrix as an up-to-date resource that could be used by the Committee and relevant sub-committees as a reference when further discussing and progressing actions under the draft 2025 Action Plan.

47 The Group therefore agreed that this action should be considered complete, but reiterated that the regulatory framework matrix was a dynamic document that should be updated when new information was communicated to the Secretariat.

48 In relation to actions 27 and 28, the Group agreed to retain both actions as continuous actions with only editorial amendments to action 28.

49 In considering action 29, the Group noted that IMO's Integrated Technical Cooperation Programme (ITCP) for the 2024-2025 biennium included marine plastic litter from ships and the Action Plan in a thematic priority, and therefore considered that this action was complete.

50 With regard to action 30, the Group recalled that the IMO-FAO GloLitter Partnerships Project, funded by Norway, had been established. Having noted that the funding for the GloLitter Partnerships Project was set to conclude in 2025, the Group agreed that if a new major project was to be established in the future, a new action could be added in a future review. Consequently, the Group considered this action completed.

New action to develop mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers

51 As instructed by the Sub-Committee, the Group developed text for a specific action concerning the development of mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers and agreed to invite the Sub-Committee to note the new action 9 under the outcome "Reduction of shipping's contribution to marine plastic litter".

Adopting resolution

52 The Group considered the draft adopting resolution for the draft 2025 Action Plan and made amendments to the text to take into account the INC, the IMO OceanLitter Programme, the adoption of the Action Plan and Strategy (resolutions MEPC.310(73) and MEPC.341(77), respectively), and decisions made during the review of the actions, namely:

- .1 the inclusion of a paragraph recalling the obligation of Member States to provide adequate port reception facilities; and
- .2 an operative paragraph inviting research on marine plastic litter from ships, in particular microplastics.

53 Having finalized the draft 2025 Action Plan, the Group invited the Sub-Committee to agree to the draft 2025 Action Plan to Address Marine Plastic Litter from Ships as set out in annex 1, with a view to adoption by MEPC 83.

Updated grouping of short-, mid-, long-term and continuous actions of the draft 2025 Action Plan

54 As instructed by the Sub-Committee, the Group prepared an updated grouping of short-, mid-, long-term and continuous actions of the draft 2025 Action Plan using annex 1 to the *Strategy to address marine plastic litter from ships* (resolution MEPC.341(77)) as a basis.

55 Subsequently, the Group agreed to invite the Sub-Committee to agree to the updated grouping of short-, mid-, long-term and continuous actions as set out in annex 2, with a view to approval in principle by MEPC 83, for inclusion in a future revision of the Strategy.

Reduction of the environmental risk associated with the maritime transport of plastic pellets

56 With regard to plastic pellets, the Group considered the instructions of the Sub-Committee to, as a first step of the analysis of the potential mandatory instruments that could be amended and the associated implications, compile a table of all documents submitted to the Sub-Committee or MEPC relating to amendments to mandatory instruments and include references to identified advantages and limitations of each approach, as well as potential impacts (e.g. on production practices, the supply chain, transport costs, and harmonization of intermodal transport requirements) to inform future discussions on the most appropriate legal framework for introducing mandatory measures.

57 In this connection, the Group agreed to consider a document prepared by the Secretariat containing a table summarizing the advantages and limitations that had been identified in all relevant submissions to MEPC, PPR, and CCC to date with regard to the mandatory instruments that could be amended to include provisions for the carriage of plastic pellets in freight containers. The Group also agreed that the table had been prepared with a view to compiling the views that had been expressed in the referenced submissions, and did not in any way constitute an assessment or analysis by the Chair or Secretariat.

58 Following an exchange of views, the Group agreed to use the table as the basis for the outcome of its work under this term of reference. The Group also agreed to review the table for accuracy and completeness with regard to the compiled views expressed, recognizing that:

- .1 the document represented a compilation of the advantages and limitations of each approach identified so far;
- .2 following its review of the document, the Group could identify further information that might be necessary to complete the analysis;
- .3 the purpose of the document was to identify information contained in submissions that could be used in the analysis; and
- .4 consequently, the review of the document would not constitute the analysis itself.

59 On the basis of the understanding that the summary would capture divergent views as expressed in submissions and that the merits of each approach would not be debated at this time, the Group conducted a detailed review of the table. The Group also agreed that in the course of this work, only views that had been expressed in a written submission would be included in the summary.

60 The Group also agreed that identified considerations which applied equally to all potential mandatory instruments would not be included in the summary, as the document was intended to facilitate a comparative analysis of instruments at a future stage. During the course of the discussion, the Group noted instruments that would apply to all options included:

- .1 SOLAS chapter V, chapter VI and the Cargo Securing Manual;
- .2 the International Convention on Salvage; and
- .3 the Nairobi Wreck Removal Convention (Nairobi WRC), noting that LEG 111 had noted that containers lost at sea were considered to be within the definition of a "wreck" in the context of the Nairobi WRC (see PPR 12/2/1, paragraph 2.2).

61 With regard to identified considerations regarding liability, the Group considered whether it was appropriate to include these in the table at this stage of the process. Some delegations expressed concerns, including:

- .1 the Legal Committee was the appropriate and competent body to deal with matters related to instruments under the purview of the Legal Committee and would need to provide advice to the PPR Sub-Committee in this regard;
- .2 it was premature to discuss liability considerations prior to the selection of the most appropriate mandatory instrument for provisions for the carriage of plastic pellets;
- .3 the terms of reference for this item did not include a specific mention of liability;
- .4 discussing liability considerations was beyond the mandate of the Working Group; and
- .5 the draft 2025 Action Plan contained an action addressing liability for plastic consumer goods lost at sea and therefore should not be considered with regard to the action related to mandatory measures for the carriage of plastic pellets.

62 Many other delegations, however, supported the inclusion of liability considerations in the table, and noted that:

- .1 when choosing the most appropriate mandatory instrument, the Sub-Committee should be aware of all direct impacts, including considerations regarding the application of the HNS Convention;
- .2 the terms of reference with regard to this instruction were not exhaustive with regard to the impacts that should be considered; and
- .3 the summary was meant to capture identified considerations and not pre-judge how these considerations might be taken into account during the next steps.

63 Having considered all views expressed, the Group agreed that in order to avoid pre-judging any considerations related to liability, these considerations would be listed in the table without identifying them as either advantages or limitations. The Group also agreed to expand the scope of this section of the table by recognizing all associated conventions which might be relevant to the analysis.

64 In the course of the review, the Group also noted considerations expressed orally but which had not been mentioned in a submission, including, inter alia:

- .1 that with regard to MARPOL Annex III, the PPR Sub-Committee was the appropriate body for substances considered a marine pollutant or severe marine pollutant;
- .2 while some submissions had addressed the time required for implementation, the analysis could consider the maturity of proposals and/or the time frame required to fully consider and develop the various options;

- .3 additional information could be provided in the future on existing proposals or new proposals, recognizing the limited opportunities to comment on recently submitted proposals, and that therefore, the views expressed in the table primarily represented those of the sponsors; and
- .4 that the intent of the proposal for a new code made mandatory through MARPOL Annex III or Annex V was for an option to introduce mandatory measures outside the limitations that had been identified for amendments to these MARPOL Annexes and could potentially also provide a dedicated instrument for plastics, including fishing gear.

65 With specific regard to time frames, the Group noted information provided by the Secretariat regarding the entry-into-force procedure and time frame for a new code, namely that the required time frame would be the same as that of amendments to the adopting instrument (e.g. the adoption of a code under MARPOL would have the same time frame as amendments to MARPOL).

66 Following discussion, the Group agreed to invite the Sub-Committee to note the table of considerations, advantages, limitations and impacts relating to amendments to mandatory instruments for each proposed approach, to inform future discussions on the most appropriate legal framework for introducing mandatory measures, as set out in annex 3.

67 Following the compilation of the table, the Group exchanged views regarding additional information that could be used in the analysis of potential mandatory instruments. The Group agreed that the following areas would benefit from further information to be submitted to the Sub-Committee to address identified gaps:

- .1 implications on other instruments, including consequential amendments;
- .2 additional considerations on new or existing proposals for potential mandatory instruments to ensure completeness;
- .3 whether and how the proposed instruments would interrelate with the training of onshore personnel;
- .4 considerations of inspection regimes and enforcement for the various proposals; and
- .5 consideration of how notification provisions would be addressed in the various proposals.

68 Having identified the areas where further information would be useful, the Group agreed to invite the Sub-Committee to:

- .1 endorse the view of the Group that a lack of information provided on the above-mentioned topics should not prevent the Sub-Committee from undertaking the analysis with the information already available; and
- .2 invite Member States and international organizations to submit documents containing additional information on the topics mentioned in paragraph 67 to a future session of the Sub-Committee.

69 Owing to time constraints, the Group was not able to further consider documents PPR 12/11/1, PPR 12/11/2, PPR 12/11/3, PPR 12/11/4, PPR 12/11/5, PPR 12/11/6, PPR 12/11/7, PPR 12/11/9, PPR 12/11/10, PPR 11/13/1, PPR 11/13/3, PPR 11/13/7, PPR 11/13/8, PPR 11/13/10 and PPR 11/13/12 with regard to the appropriate instruments that could form the legal basis for mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers.

Reporting of fishing gear that has been lost or discharged from a ship as provided for in regulation 7.1.3 and 7.1.4 of MARPOL Annex V

70 As requested by the Sub-Committee, the Group considered the data to be reported to IMO to meet objectives 1 to 3 of the IMO database set out in paragraph 21 of document PPR 11/13, using the outcome of the discussions from the Correspondence Group (PPR 12/11) as a basis. The Group reviewed both the data to be reported to IMO and whether this reporting should be mandatory or voluntary, with a view to making a recommendation to the Sub-Committee on the data to be reported.

71 In considering data to be reported on ship particulars, the Group agreed to the mandatory reporting of the length and type of fishing vessel as this would assist in providing a profile of the vessel in line with the objectives of the database, without providing specific identifying information. Subsequently, the Group agreed that reporting the vessel name and IMO number or registration would be voluntary. In considering the applicability of the IMO number or registration of a vessel, it was agreed to also include an option to report the vessel call sign in order to capture all vessels that would be required to report.

72 In relation to the event particulars, the Group agreed to retain the recommendation of the Correspondence Group to require the mandatory reporting of the position where the fishing gear had been lost or discharged; and the date when the gear has been lost or discharged. In relation to the time when gear had been lost or discharged, it was agreed that the requirement to report the exact time was too prescriptive and as such this element was removed. Having agreed that data on the time should be mandatory, the Group also agreed to add the term "if known" to reflect that this information may not be available.

73 The Group also considered options prepared by the Correspondence Group on the reason for the loss or discharge of fishing gear. The Group agreed that though this data should be mandatory, the term "if known" should be added to reflect that this information may not be available.

74 In the course of the discussion, the Group noted the importance of ensuring that the agreed data requirements did not create a disincentive for reporting. In this regard, some delegations raised concerns that requiring information on measures taken by the fishing vessel to retrieve the gear could create a disincentive to reporting. In light of these concerns, the Group agreed that while the reporting of this information should be mandatory, there should not be a requirement to explain why no action was taken.

75 In relation to data to be reported on the lost or discharged fishing gear, the Group again used the recommendations of the Correspondence Group as the basis for discussions. In considering the most appropriate data to be reported to meet the objectives of the database, the Group agreed that the reporting of fishing gear types should be mandatory. However in considering the metrics to be used to report the amount of gear lost, a single metric, such as m³/imperial units, would not be appropriate as it could not be applied to all types of fishing gear to be reported. In this regard, the Group also agreed that approximate percentage of gear lost was not an appropriate metric for reporting, given that determination of the percentage lost or discharged would also require reporting information of the total amount of associated gear used. Recognizing the importance of identifying the most appropriate metric for reporting the amount of gear lost, the Group undertook a discussion on metrics in accordance with term of reference 8.

76 The Group agreed that while the reporting of the quantity of gear lost or discharged should be mandatory, the metric needed to be flexible to allow for the various units currently in use by the sector. In this regard, the Group agreed that there should be the ability to assign the most appropriate metric to the specific gear type. The Group agreed that more work was required to determine how this would be accommodated in the reporting requirements and that this could be further considered through proposals from interested Member States and international organizations. The Group also agreed that the characteristics of the gear lost was useful information to meet the objectives of the database, and therefore agreed to require the description of the part of the fishing gear that was lost or discharged to be reported. In this regard, the Group noted that the mandatory reporting requirements for fishing gear type, description and quantity would together ensure that reports provided information around the classification, characterization and quantification of lost or discharged fishing gear, respectively.

77 The Group also agreed that the reporting of the sequential number or other identification marks of the tags attached to the lost or discharged fishing gear should be voluntary.

78 A table summarizing the Group's recommendation on the data to be reported to IMO to meet objectives 1 to 3 of the IMO database is set out in annex 4.

79 Owing to time constraints, the Group was not able to consider the inclusion of the additional data identified in paragraph 22 of document PPR 12/11, namely marine environment conditions at the time of loss/discharge; fishing gear recovered; and wildlife entanglement.

80 In considering the remaining data to be considered under term of reference 8, the Group did not have an opportunity to further consider the anonymization and aggregation of data, nor the flow of reporting in any detail, and therefore agreed that these aspects remain outstanding issues for further consideration at a future session. In this regard, the Group agreed to recommend that further proposals from interested Member States and international organizations be submitted to a future session of the Sub-Committee.

81 In considering the need to re-establish the correspondence group on marine plastic litter from ships, the Group agreed that as time did not permit an in-depth discussion on the outstanding issues identified in term of reference 8, the Group would not be in a position to provide a correspondence group with the necessary direction to be able to further the work intersessionally. Therefore, the Group agreed not to recommend the re-establishment of the correspondence group on marine plastic litter from ships.

Action requested of the Sub-Committee

- 82 The Sub-Committee is invited to approve the report in general and, in particular, to:
- .1 note the Group's agreement to incorporate the proposals in document MEPC 80/8 into the draft 2025 Action Plan under action 3 (paragraph 17);
 - .2 note the inclusion of a dedicated action concerning the development of mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers in the draft 2025 Action Plan (paragraph 51);
 - .3 agree to the draft 2025 Action Plan to Address Marine Plastic Litter from Ships as set out in annex 1, with a view to adoption by MEPC 83 (paragraph 53);

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- .4 agree to the updated grouping of short-, mid-, long-term and continuous actions as set out in annex 2, with a view to approval in principle by MEPC 83 for inclusion in a future revision of the Strategy (paragraph 55);
 - .5 note the table of considerations, advantages, limitations and impacts relating to amendments to mandatory instruments for each proposed approach for the carriage of plastic pellets by sea in freight containers, to inform future discussions on the most appropriate legal framework for introducing mandatory measures, as set out in annex 3 (paragraph 66);
 - .6 endorse the view of the Group that a lack of information provided on the topics identified in paragraph 67 should not prevent the Sub-Committee from undertaking the analysis with the information already available (paragraph 68.1);
 - .7 invite interested Member States and international organizations to submit documents containing additional information on the topics mentioned in paragraph 67 to a future session of the Sub-Committee (paragraph 68.2);
 - .8 note that owing to time constraints, the Group was not able to further consider documents PPR 12/11/1, PPR 12/11/2, PPR 12/11/3, PPR 12/11/4, PPR 12/11/5, PPR 12/11/6, PPR 12/11/7, PPR 12/11/9, PPR 12/11/10, PPR 11/13/1, PPR 11/13/3, PPR 11/13/7, PPR 11/13/8, PPR 11/13/10 and PPR 11/13/12 with regard to the appropriate instruments that could form the legal basis for mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers (paragraph 69);
 - .9 endorse the Group's recommendation on the data to be reported to IMO to meet objectives 1 to 3 of the IMO database (paragraph 78 and annex 4);
 - .10 note that owing to time constraints, the Group was not able to consider the inclusion of the additional data identified in paragraph 22 of document PPR 12/11 (paragraph 79);
 - .11 invite interested Member States and international organizations to submit written proposals to a future session of the Sub-Committee to further develop the specifics of the agreed data to be reported to IMO, including submissions associated with the outstanding issues (paragraph 80); and
 - .12 endorse the Group's recommendation not to re-establish the correspondence group on marine plastic litter from ships (paragraph 81).

ANNEX 1

DRAFT RESOLUTION MEPC.[...](83)

DRAFT 2025 ACTION PLAN TO ADDRESS MARINE PLASTIC LITTER FROM SHIPS

THE MARINE ENVIRONMENT PROTECTION COMMITTEE

RECALLING Article 38(e) of the Convention on the International Maritime Organization (the Organization) concerning the functions of the Marine Environment Protection Committee (the Committee) conferred upon it by international conventions for the prevention and control of marine pollution from ships,

ACKNOWLEDGING that work to prevent pollution by garbage from ships has been undertaken by the Organization since the adoption of MARPOL Annex V,

ACKNOWLEDGING ALSO the relevance of the work on marine plastic litter undertaken by the Parties to the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972 and its 1996 Protocol, including the adoption in 2016 of a "Recommendation to Encourage Action to Combat Marine Litter",

ACKNOWLEDGING FURTHER the relevant work of other international organizations in relation to marine plastic litter, in particular FAO, UN Environment Programme and the Intergovernmental Negotiating Committee to develop an international legally binding instrument on plastic pollution, including in the marine environment (INC), and the importance of existing cooperation mechanisms, including GESAMP, the Joint FAO/IMO Ad Hoc Working Group on IUU fishing and related matters, the IMO OceanLitter Programme and the Global Partnership on Plastic Pollution and Marine Litter,

RECALLING the United Nations 2030 Agenda for Sustainable Development, in particular Sustainable Development Goal (SDG) 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development,

RECALLING ALSO that the Assembly, at its thirtieth session, in December 2017, recognized the ongoing problem of marine plastic pollution, as addressed in MARPOL Annex V, which required further consideration as part of a global solution within the framework of ocean governance, in pursuance of the target of Sustainable Development Goal 14 to prevent and significantly reduce marine pollution of all kinds by 2025,

RECALLING FURTHER that the Committee at its seventy-third session (MEPC 73) in October 2018 adopted, by resolution MEPC.310(73), the *Action Plan to Address Marine Plastic Litter from Ships*,

RECALLING that the Committee at its seventy-seventh session (MEPC 77) in November 2021 adopted, by resolution MEPC.341(77), the *Strategy to address marine plastic litter from ships*,

RECALLING ALSO the obligation of Member States to provide adequate facilities at ports and terminals for the reception of garbage, as required by regulation 8 of MARPOL Annex V, and ensure this obligation is implemented effectively,

- 1 ADOPTS the *2025 Action Plan to Address Marine Plastic Litter from Ships* (hereinafter the 2025 Action Plan) as set out in the annex to the present resolution;
- 2 NOTES the application of the 2025 Action Plan to all ships, including fishing vessels;
- 3 INVITES Member States, international organizations and other relevant bodies to undertake further studies to better understand discharges of marine plastic litter, in particular microplastics, from ships;
- 4 INVITES the Secretary-General of the Organization to make adequate provisions in the Integrated Technical Cooperation Programme (ITCP) to support relevant follow-up actions of the 2025 Action Plan;
- 5 AGREES to keep the 2025 Action Plan under review, with a view to assessing, in 2030, the effectiveness of the actions within the Action Plan against the intended outcomes;
- 6 ALSO AGREES that the 2025 Action Plan supersedes the Action Plan adopted by resolution MEPC.310(73).

ANNEX

DRAFT 2025 ACTION PLAN TO ADDRESS MARINE PLASTIC LITTER FROM SHIPS

1 Background

1.1 Marine plastic litter enters the marine environment as a result of a wide range of land- and sea-based activities. Both macroplastics (e.g. large plastic items such as plastic bags, water bottles and fishing gear) and microplastics (small plastic particles generally five millimetres or less in size) persist in the marine environment and result in harmful effects on marine life and biodiversity, as well as negative impacts on human health. In addition, marine plastic litter negatively impacts activities such as tourism, fisheries and shipping. This plastic material has the potential to be brought back into the economy by means of reuse or recycling. Studies demonstrate that despite the existing regulatory framework to prevent marine plastic litter from ships, discharges into the sea continue to occur.

1.2 IMO has recognized the importance of preventing pollution by garbage, including plastics, from ships since the adoption of MARPOL Annex V, as well as the dumping of various types of waste, including plastics, into the sea through the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter 1972 (London Convention or LC) and its 1996 Protocol (London Protocol or LP). This commitment was reinforced by the IMO Assembly, at its thirtieth session, in December 2017, recognizing the ongoing problem of marine plastic pollution, as addressed in MARPOL Annex V, which required further consideration as part of a global solution within the framework of ocean governance, in pursuance of the target of Sustainable Development Goal 14 to prevent and significantly reduce marine pollution of all kinds by 2025.

1.3 IMO recognizes the importance of continued action to manage this global issue. In 2016, the thirty-eighth Consultative Meeting of Contracting Parties to the London Convention and the eleventh Meeting of Contracting Parties to the London Protocol adopted a "Recommendation to Encourage Action to Combat Marine Litter". In 2018, MEPC 73 adopted the *Action Plan to Address Marine Plastic Litter from Ships* by resolution MEPC.310(73).

1.4 IMO has committed to working closely with a number of partners to address the issue of marine plastic litter including, but not limited to:

- .1 FAO through the Joint FAO/IMO Ad Hoc Working Group on IUU Fishing and Related Matters (JWG) and the IMO OceanLitter Programme;
- .2 the Joint Group of Experts on the Scientific Aspects of Marine Environmental Protection (GESAMP);
- .3 the UN Environment-managed Global Partnership on Plastic Pollution and Marine Litter (GP3ML);
- .4 the United Nations Open-ended Informal Consultative Process on Oceans and the Law of the Sea (ICP);
- .5 the United Nations Environment Assembly (UNEA); and
- .6 the Intergovernmental Negotiating Committee to develop an international legally binding instrument on plastic pollution, including in the marine environment (INC).

2 Objective

The *2025 Action Plan to Address Marine Plastic Litter from Ships* has been developed to contribute to the global solution for preventing marine plastic litter from entering the oceans through ship-based activities. This Action Plan provides IMO with a mechanism to identify specific outcomes, and actions to achieve these outcomes, in a way that is meaningful and measurable. The 2025 Action Plan builds on existing policy and regulatory frameworks, and identifies opportunities to enhance these frameworks and introduce new supporting measures to address the issue of marine plastic litter from ships. The 2025 Action Plan also recognizes the actions that have been completed since the adoption of the initial Action Plan in 2018, demonstrating the considerable work undertaken by IMO to address this important issue.

3 Time frames, review and evaluation

3.1 The measures within the 2025 Action Plan should be completed by 2030.

3.2 Specific time frames for individual measures have been captured in the below table of actions and reflected in the revised annex 1 to the *Strategy to address marine plastic litter from ships* [PPR 12/WP.7, annex [...]]. Paragraph 4.1 of the *Strategy to address marine plastic litter from ships* (resolution MEPC.341(77)) provides the definitions for these time frames.

3.3 The 2025 Action Plan will be reviewed after five years with a view to updating the actions based on information submitted by Member States and international organizations on the implementation of the 2025 Action Plan.

4 Actions

	Outcome	Measures	Parent Organ	Coordinating/ Associated Organ	Time Frame	Associated partners
1	Reduction of marine plastic litter generated from, and retrieved by, fishing vessels	Consider making the IMO Ship Identification Number Scheme mandatory for all fishing vessels over 24 metres in length through an amendment to the Cape Town Agreement once it enters into force.	MSC / MEPC		Mid-term	
2		Encourage the ratification of the Cape Town Agreement	MSC / MEPC		Continuous	
3		Taking into account the FAO Voluntary Guidelines on the Marking of Fishing Gear and new and existing regional fisheries management organization requirements, develop mandatory goal-based measures under MARPOL Annex V for the marking of fishing gear that would avoid duplication with existing measures, instruments and frameworks	MEPC	PPR / III (JWG)	Mid-term	FAO
4		Consider the development of measures for a ship-specific management plan for the gear and equipment deployed in fishing activities, including the logging of fishing gear on board a fishing vessel	MEPC	PPR / III	Short-term	FAO
5		Develop a circular reminding IMO Member States to collect information from their registered fishing vessels regarding any discharge or accidental loss of fishing gear	MEPC	PPR	Short-term	

	Outcome	Measures	Parent Organ	Coordinating/ Associated Organ	Time Frame	Associated partners
6		Consider the preparation of a circular reminding Member States to enforce MARPOL Annex V on fishing vessels through PSC measures, if appropriate Encourage port State control MoUs to develop PSC procedures that include fishing vessels, if appropriate	MEPC	PPR / III	Mid-term	
7	Reduction of shipping's contribution to marine plastic litter	Consider whether and how to address the responsibility, and if appropriate, liability for plastic consumer goods lost at sea from ships	LEG / MEPC	PPR	Long-term	
8		Consider enhancing the enforcement of MARPOL Annex V, including, where possible, through a risk-based approach	MEPC	PPR / III	Short-term	
9		Consider and develop mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers	MEPC / MSC	PPR / CCC	Short-term	
10	Improvement of the effectiveness of port reception and facilities and treatment in reducing marine plastic litter	Consider the requirement for port reception facilities to provide for separate garbage collection for plastic waste from ships, including fishing gear, if appropriate, to facilitate reuse or recycling	MEPC	PPR	Mid-term	
11		Consider mechanisms to enhance the enforcement of MARPOL Annex V requirements for the delivery of garbage to reception facilities	MEPC	PPR	Mid-term	

	Outcome	Measures	Parent Organ	Coordinating/ Associated Organ	Time Frame	Associated partners
12		<p>Consider facilitating the mandatory use of port waste management plans to ensure the provision of adequate waste reception facilities</p> <p>Identify information from the port waste management plans that can be shared via the Global Integrated Shipping Information System (GISIS)</p> <p>Encourage Member States to address the entire process of plastic garbage handling and ensure that landed garbage is managed in a sustainable manner ashore</p>	MEPC	PPR / III	Mid-term	
13	Enhanced public awareness, education and seafarer training	Consider ways to publicly promote the work of IMO to address marine plastic litter generated from ships	MEPC	PPR	Continuous	
14		<p>Consider how the model course "Marine Environmental Awareness 1.38" could be amended/revised to specifically address marine plastic litter</p> <p>Monitor the progress of the comprehensive review of the STCW (International Convention on Standards and Training, Certification and Watch keeping for Seafarers) and Code to ensure familiarization of all seafarers of the minimum requirements with regard to marine plastic litter</p>	MEPC	HTW / PPR	Short-term	

	Outcome	Measures	Parent Organ	Coordinating/ Associated Organ	Time Frame	Associated partners
15	Improved understanding of the contribution of ships to marine plastic litter	Consider extending the reporting requirement in regulation 10.6 of MARPOL Annex V to include reporting data on discharge or accidental loss of fishing gear by the flag State to IMO via GISIS or other means if appropriate	MEPC	PPR / III	Short-term	
16		Encourage Member States and international organizations that have conducted scientific research related to marine litter from ships to share the results of such research, including any information on microplastics from ships or the areas contaminated by marine litter from ships	MEPC	PPR	Continuous	
17		With regard to the IMO Study on marine plastic litter from ships, decide how to progress the work through proposals either identifying priority sub-projects or providing revised terms of reference, taking into account MEPC.1/Circ.894	MEPC LC/LP	PPR	Short-term	GESAMP, FAO, UN Environment, RFMOs, World Oceans Assessment, Regional Seas Conventions
18	Strengthened international cooperation	Make information available to the United Nations Environment Assembly (UNEA)	MEPC LC/LP	PPR	Continuous	
19		Continue work with other United Nations bodies and agencies, as well as with international forums, which are active in the matter of marine plastic litter from shipping, such as through the Global Partnership on Plastic Pollution and Marine Litter (GP3ML)	MEPC LC/LP	PPR	Continuous	

APPENDIX

COMPLETED ACTIONS AS OF THE 2025 REVIEW OF THE INITIAL ACTION PLAN TO ADDRESS MARINE PLASTIC LITTER FROM SHIPS (RESOLUTION MEPC.310(73))

Outcome	Measures
Reduction of marine plastic litter generated from, and retrieved by, fishing vessels	Consider the development of best management practice to facilitate incentives for fishing vessels to retrieve derelict fishing gear and deliver it to port reception facilities, in collaboration with FAO
	Consider the issue of waste that has been collected during fishing operations building on experience gathered from established projects
	Review the application of placards, garbage management plans and garbage record-keeping (regulation 10, MARPOL Annex V), for example making the Garbage Record Book mandatory for ships of 100 GT and above
Reduction of shipping's contribution to marine plastic litter	Review the application of placards, garbage management plans and garbage record-keeping (regulation 10, MARPOL Annex V), for example making the Garbage Record Book mandatory for ships of 100 GT and above
	Consider the establishment of a compulsory system of formatted declarations of the loss of containers and the means on board to easily identify the exact number of losses Also, consider establishing an obligation to report through a standardized procedure the loss of containers
	Consider ways to communicate the location of containers lost overboard based on additional information to be provided by interested parties
Improvement of the effectiveness of port reception and facilities and treatment in reducing marine plastic litter	Consider the development of tools to support the implementation of cost frameworks associated with port reception facilities, taking into account the need to not create disincentives for the use of port reception facilities, the potential benefits of cost incentives that provide no additional fees based on volume and identifying waste types that can be reduced, reused or recycled through schemes that identify waste revenue
	Further consider the impact on small island developing States and on remote locations such as polar regions when planning for the disposal of waste to land-based facilities

Outcome	Measures
Enhanced public awareness, education and seafarer training	Consider tasking the HTW Sub-Committee with reviewing chapter III of STCW-F (Basic safety training for all fishing vessel personnel) to ensure that all fishing vessel personnel, before being assigned any shipboard duties, receive basic training on marine environment awareness oriented on marine plastic litter including abandoned, lost or otherwise discarded fishing gear (ALDFG)
Improved understanding of the contribution of ships to marine plastic litter	Invite Member States and international organizations to undertake studies to better understand microplastics from ships
Improved understanding of the regulatory framework associated with marine plastic litter from ships	Consider the development of a regulatory framework matrix for the purpose of a gap analysis
Targeted technical cooperation and capacity-building	Address implementation issues related to the Action Plan to Address Marine Plastic Litter from Ships in the context of IMO technical cooperation and capacity-building activities
	Consider the establishment of externally funded major projects under the auspices of IMO in support of the Action Plan to Address Marine Plastic Litter from Ships

ANNEX 2

UPDATED GROUPING OF SHORT-, MID-, LONG-TERM AND CONTINUOUS ACTIONS OF THE 2025 ACTION PLAN TO ADDRESS MARINE PLASTIC LITTER FROM SHIPS

	Outcome	Actions
Short-term actions		
5	Reduction of marine plastic litter generated from, and retrieved by, fishing vessels	Develop a circular reminding IMO Member States to collect information from their registered fishing vessels regarding any discharge or accidental loss of fishing gear
4		Consider the development of measures for a ship-specific management plan for the gear and equipment deployed in fishing activities, including the logging of fishing gear on board a fishing vessel
8	Reduction of shipping's contribution to marine plastic litter	Consider enhancing the enforcement of MARPOL Annex V, including, where possible, through a risk-based approach
9		Consider and develop mandatory measures to reduce the environmental risks of plastic pellets transported by sea in freight containers
14	Enhanced public awareness, education and seafarer training	Consider how the model course "Marine Environmental Awareness 1.38" could be amended/revised to specifically address marine plastic litter Monitor the progress of the comprehensive review of the STCW (International Convention on Standards of Training, Certification and Watchkeeping for Seafarers) and Code to ensure familiarization of all seafarers of the minimum requirements with regard to marine plastic litter
15	Improved understanding of the contribution of ships to marine plastic litter	Consider extending the reporting requirement in regulation 10.6 of MARPOL Annex V to include reporting data on discharge or accidental loss of fishing gear by the flag State to IMO via GISIS or other means, if appropriate
17		With regard to the IMO Study on marine plastic litter from ships, decide how to progress the work through proposals either identifying priority sub-projects or providing revised terms of reference, taking into account MEPC.1/Circ.894
Mid-term actions		
1	Reduction of marine plastic litter generated from, and retrieved by, fishing vessels	Consider making the IMO Ship Identification Number Scheme mandatory for all fishing vessels over 24 metres in length through an amendment to the Cape Town Agreement once it enters into force.
3		Taking into account the FAO Voluntary Guidelines on the Marking of Fishing Gear and new and existing regional fisheries management organization requirements, develop mandatory goal-based measures under MARPOL Annex V for the marking of fishing gear that would avoid duplication with existing measures, instruments and frameworks.

	Outcome	Actions
6		<p>Consider the preparation of a circular reminding Member States to enforce MARPOL Annex V on fishing vessels through PSC measures, if appropriate</p> <p>Encourage port State control MoUs to develop PSC procedures that include fishing vessels, if appropriate</p>
10	Improvement of the effectiveness of port reception and facilities and treatment in reducing marine plastic litter	Consider the requirement for port reception facilities to provide for separate garbage collection for plastic waste from ships, including fishing gear, if appropriate, to facilitate reuse or recycling
11		Consider mechanisms to enhance the enforcement of MARPOL Annex V requirements for the delivery of garbage to reception facilities
12		<p>Consider facilitating the mandatory use of port waste management plans to ensure the provision of adequate waste reception facilities</p> <p>Identify information from the port waste management plans that can be shared via the Global Integrated Shipping Information System (GISIS)</p> <p>Encourage Member States to address the entire process of plastic garbage handling and ensure that landed garbage is managed in a sustainable manner ashore</p>
Long-term actions		
7	Reduction of shipping's contribution to marine plastic litter	Consider whether and how to address the responsibility, and if appropriate, liability for plastic consumer goods lost at sea from ships
Continuous actions		
18	Strengthened international cooperation	Make information available to the United Nations Environment Assembly (UNEA)
19		Continue work with other United Nations bodies and agencies, as well as with international forums, which are active in the matter of marine plastic litter from shipping, such as through the Global Partnership on Plastic Pollution and Marine Litter (GP3ML)
2	Reduction of marine plastic litter generated from, and retrieved by, fishing vessels	Encourage the ratification of the Cape Town Agreement
13	Enhanced public awareness, education and seafarer training	Consider ways to publicly promote the work of IMO to address marine plastic litter generated from ships
16	Improved understanding of the contribution of ships to marine plastic litter	Encourage Member States and international organizations that have conducted scientific research related to marine litter from ships to share the results of such research, including any information on microplastics from ships or the areas contaminated by marine litter from ships

ANNEX 3

TABLE OF POTENTIAL MANDATORY INSTRUMENTS TO REDUCE THE ENVIRONMENTAL RISK OF THE MARITIME TRANSPORT OF PLASTIC PELLETS

The below table of potential mandatory instruments to reduce the environmental risk of the maritime transport of plastic pellets represents a collation of all documents submitted to date relating to amendments to mandatory instruments and includes all references to the advantages and limitations of each approach, as well as potential impacts identified in those documents. This information is the first step in the analysis of the potential mandatory instruments that could be amended to inform future discussions on the most appropriate legal framework for introducing mandatory control measures. The below information does not represent the full analysis of these options and should be used as a basis for future discussions, recognizing additional information may be submitted to facilitate the finalization of the analysis.

ASSIGNMENT OF AN INDIVIDUAL UN NUMBER (CLASS 9) FOR PLASTIC PELLETS

Description

- An individual UN number (class 9) could be assigned by the UN Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals for a material considered to present a danger during transport
- A special provision assigned to that new UN number would restrict the application to maritime transport only and packing instructions would be assigned as considered appropriate by the PPR Sub-Committee

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> • Hazard class 9 includes the category "Other substances and articles presenting a danger during transport, but not meeting the definitions of another class" without specifying the type of potential danger. The UN Model Regulations contain examples of substances that represent physical and not chemical hazards, as well as several UN numbers that apply only to sea or air transport (PPR 11/13/3, paragraphs 7 to 9; CCC 9/2/4, paragraphs 19 to 21)

	<ul style="list-style-type: none"> • Reporting of incidents involving dangerous goods/harmful substances would be required (PPR 10/13, paragraph 39; PPR 10/13/5*, paragraph 11) (supplemented by SOLAS amendments adopted by MSC 108 (resolution MSC.550(108)) on reporting of all container losses) • Regimes to carry out inspections and a legal framework to prosecute infringements are in place for dangerous goods (PPR 11/13/3, annex) • Internationally established and well-developed regulatory framework (PPR 10/13, paragraph 39; PPR 10/13/5, paragraph 11)
Identified limitations	<ul style="list-style-type: none"> • Outside the remit of IMO: a document containing an application for a new UN Number needs to be submitted for consideration of the UN Sub-Committee of Experts on the Transport of Dangerous Goods (TDG Sub-Committee) (PPR 11/13/7, paragraph 10; PPR 10/13, paragraph 34; PPR 12/11/3, paragraph 6); Unclear if the UN TDG Sub-Committee would agree to assign a UN number (PPR 11/13/7, paragraph 10) • Environmental impact posed by plastic pellets relates to their physical characteristics, whereas the established classification definitions and criteria relate to the aquatic toxicity of a substance (CCC 9/2/2, paragraph 17; PPR 9/15/8, paragraph 3; PPR 10/13/7, paragraph 13; PPR 10/13, paragraph 36) • Approach would be against the primary goal of the general framework to provide uniformity on regulations concerning transport of dangerous goods for all transport modes (PPR 9/15/9, paragraph 10); as this framework is standardized across land, sea, and air transport, it is necessary to carefully assess the justification for categorizing plastic pellets as dangerous goods not only for maritime transport but also for land and air transport modes (PPR 12/11/2, paragraph 17) • Would result in a significant delayed compliance period, with at least four to five years before the applicable amendments to the IMDG Code enter into force (PPR 10/13, paragraphs 34 and 42; PPR 10/13/7, paragraphs 14 and 18) • Plastic pellets are not currently classified as harmful substances (PPR 12/11/3, paragraph 6)
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> • Dangerous goods transport information according to section 5.4.1 of the IMDG Code and dangerous goods manifest according to section 5.4.3 of the IMDG Code and FAL form 7; New stowage category in the IMDG Code: Category F "under deck whenever possible; on deck permitted only in protected locations" (PPR 11/13/3, annex)

* Views expressed in document PPR 10/13/5 are based on: Faber, J. et al. (2023). *Preventing spills of plastic pellets: a feasibility analysis of regulatory options*. CE Delft. Available at <https://cedelft.eu/publications/preventing-spills-of-plastic-pellets/>

	<ul style="list-style-type: none"> • Would allow the development of carriage requirements that are tailor-made to reduce the environmental risk associated with the maritime transport of plastic pellets (PPR 10/13, paragraph 34) with packing instructions that would be assigned as considered appropriate by the PPR Sub-Committee (PPR 11/13/3, paragraph 8; PPR 12/11/3, paragraph 6; PPR 11/13/3, annex) • UN type-approved packaging would be required (PPR 11/13/3, annex)
Identified limitations	<ul style="list-style-type: none"> • Packaging in accordance with the IMDG Code is intended to protect the contents during conditions normally encountered in transport. It does not envision that packagings, tanks, bulk containers, cargo transport units, etc. are able to withstand circumstances such as fire, sinking of a vessel, or exceptional damage in transport (PPR 9/15/9, paragraphs 7 and 9; CCC 9/2/2, paragraphs 16 and 18) • Mandated use of UN-specification packaging would generate increased quantities of packaging waste (PPR 9/15/9, paragraph 13.3) • Transition to UN-specification packaging would result in a long and complex implementation due to validating/designing, certifying and manufacturing new packaging types; use of any new packaging types may result in modifying or even replacing existing filling and emptying installations (PPR 10/13/7, paragraphs 9 and 16)
Considerations of associated conventions	
	<ul style="list-style-type: none"> • The HNS Convention would apply to this approach after the entry into force of the HNS Convention (PPR 9/15/1, paragraphs 23 and 24; PPR 10/13, paragraph 39; PPR 11/13/3, paragraph 15) • Compensation of damage caused by packaged HNS is to be covered by contributions from the receivers of bulk solid and liquid chemicals, which have nothing to do with plastic pellet transport, after shipowner's liability, which goes against the "polluters pay" principle (PPR 9/15/8, paragraphs 5 to 7; PPR 10/13, paragraph 40)
Identified impacts	
Identified advantages	<ul style="list-style-type: none"> • No intermodal problems are known related to UN numbers applicable to sea or air transport only (CCC 9/2/4, paragraph 21) • Some of the negative effects would be transient and the effects on the supply chain could be reduced by developing precise transport, packaging and stowage requirements for plastic pellets (PPR 10/13, paragraph 42) • The additional costs of all options appear to be manageable based on feedback from interviewees (PPR 10/13/5, paragraph 11)

Identified limitations	<ul style="list-style-type: none">• Complications of disharmonization can be significant: sea mode necessarily involves intermodal transport on each side of the sea journey. Intermodal transport with different classifications for different modes can be a challenge for ensuring appropriate documents, marks, labels and placards at different stages, cause delays at ports/terminals triggered by confusion from carriers, shippers, customs, etc, and confusion on the lead time required for announcing freight containers containing plastic pellets to the terminal, on the storage requirements imposed by terminals for plastic pellet freight containers, and the maximum allowed storage period (PPR 11/13/7, paragraph 9; CCC 9/2/2, paragraph 33)• Would impact the entire supply chain and could lead to increased costs due to technical and logistical improvements to the supply chain and transport operations, such as converting existing "non-dangerous goods facilities" used for plastic pellets into "dangerous good facilities," which would require new registrations, compliance management programmes and training of employees (PPR 9/15/9, paragraph 13.3; PPR 10/13, paragraph 41; PPR 10/13/7, paragraph 15)• Would significantly increase the quantity of dangerous goods handled, diminish the emphasis on actual dangerous goods, and minimize the effectiveness of the IMDG Code's safety measures, possibly leading to environmental and safety incidents; increased number of freight containers identified on a ship's dangerous goods manifest divert attention away from the actual dangerous goods on board that require special focus to ensure the safety of the ship and crew (PPR 10/13/7, paragraph 17)• Several of the negative consequences included above (e.g. appropriate documents, marks, labels and placards at different stages, lead time required for announcing freight containers containing plastic pellets to the terminal, certification of warehouses to be able to store plastic pellets as dangerous goods) could be long-lasting or permanent (PPR 10/13/7, paragraph 18; PPR 11/13/7, paragraph 9; CCC 9/2/2, paragraph 33)
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AN AMENDMENT TO APPENDIX I OF MARPOL ANNEX III THAT WOULD RECOGNIZE PLASTIC PELLETS AS A "HARMFUL SUBSTANCE"

Description

- Plastic pellets would fall under the substance classification categories and criteria for "Environmental hazardous substances (aquatic environment)" (Marine pollutant) contained in section 2.9.3 of IMDG Code (PPR 9/15/1, paragraph 12)
- Plastic pellets would be transported under the entry: "UN 3077 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S.", and subject to IMDG Code requirements (PPR 9/15/1, paragraphs 20 and 21)

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> • Within the remit of IMO (PPR 10/13, paragraph 36; PPR 10/13/5, paragraph 9) • Reporting of incidents involving dangerous goods/harmful substances would be required (PPR 10/13, paragraph 39; PPR 10/13/5, paragraph 11) (supplemented by SOLAS amendments adopted by MSC 108 (resolution MSC.550(108)) on reporting of all container losses) • Amending MARPOL Annex III follows the precedent of appendix I to MARPOL Annex V, which recognizes plastics as harmful to the marine environment (PPR 10/13/5, paragraph 9) • MARPOL Annex III addresses cargo (PPR 12/11/1, paragraph 11) • Regimes to carry out inspections and a legal framework to prosecute infringements are in place for dangerous goods (PPR 11/13/3, annex)
Identified limitations	<ul style="list-style-type: none"> • Classification of plastic pellets using this approach would not be in line with the Globally Harmonized System (GHS), as plastic pellets do not fall within this classification scheme; "direct assignment" is not consistent with GHS classification, and the GHS criteria do not recognize environmental impact posed by plastic pellets relates to their physical characteristics, whereas the established classification definitions and criteria relate to the aquatic toxicity of a substance (PPR 11/13/3, annex; PPR 11/13/7 paragraph 8; CCC 9/2/2, paragraph 17; PPR 9/15/8, paragraph 3; PPR 10/13/7, paragraph 13; PPR 10/13, paragraph 36) • Approach would be against the primary goal of the general framework to provide uniformity on regulations concerning transport of dangerous goods for all transport modes (PPR 9/15/9, paragraph 10) • Applicability of the IMDG Code requires consideration, including consequential amendments (e.g. to 2.10.3.1 of the IMDG Code) (PPR 10/13, paragraph 37; CCC 9/2/4, paragraphs 9 to 11; PPR 11/13/3, paragraph 12 and annex) • Does not address freight container loss or breach at sea, which is often the cause of incidents (PPR 9/15/8, paragraph 4; PPR 10/13/7, paragraph 14; CCC 9/2/2, paragraph 16) • Plastic pellets are not currently classified as harmful substances (PPR 12/11/3, paragraph 6)
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> • Sets minimum standards for acceptable packaging and recommends a more protected stowage of containers containing plastic pellets. (PPR 9/15/1, paragraph 20; PPR 10/13/5, paragraph 11; PPR 11/13/3, annex)

	<ul style="list-style-type: none"> • Specific stowage requirements for marine pollutants in provision 7.1.4.2 of the IMDG Code: "Where stowage is permitted on deck or under deck, under deck stowage is preferred. Where stowage on deck only is required, preference shall be given to stowage on well-protected decks or to stowage inboard in sheltered areas of exposed decks." (PPR 9/15/1, footnote to paragraph 21.4) • Internationally established and well-developed regulatory framework where the general requirements for dangerous goods/harmful substances would apply (PPR 10/13, paragraph 39) (PPR 10/13/5, paragraph 11) • Dangerous goods transport documentation according to the IMDG Code (PPR 11/13/3, annex)
Identified limitations	<ul style="list-style-type: none"> • Packaging in accordance with the IMDG Code is intended to protect the contents during conditions normally encountered in transport. It does not envision that packagings, tanks, bulk containers, cargo transport units, etc. are able to withstand circumstances such as fire, sinking of a vessel, or exceptional damage in transport (PPR 9/15/9, paragraphs 7 and 9; CCC 9/2/2, paragraph 16 and 18) • Mandatory under-deck stowage would require amendments to carriage requirements for UN 3077 (PPR 11/13/3, paragraph 12; and PPR 10/13/5, paragraph 11) • A generic name supplemented by a technical name for plastic pellets would not be the most favourable approach for notification regarding the presence of plastic pellets (CCC 9/2/4, paragraphs 9 to 11; PPR 11/13/3, paragraph 12 and annex) • Would significantly increase the quantity of dangerous goods handled, diminish the emphasis on actual dangerous goods, and minimize the effectiveness of the IMDG Code's safety measures, possibly leading to environmental and safety incidents; increased number of freight containers identified on a ship's dangerous goods manifest divert attention away from the actual dangerous goods on board that require special focus to ensure the safety of the ship and crew (PPR 10/13/7, paragraph 17) • Transition to UN-specification packaging would result in a long and complex implementation due to validating/designing, certifying and manufacturing new packaging types; use of any new packaging types may result in modifying or even replacing existing filling and emptying installations (PPR 10/13/7, paragraphs 9 and 16)
Considerations of associated conventions	
	<ul style="list-style-type: none"> • The HNS Convention would apply (PPR 9/15/1, paragraphs 23 and 24; PPR 10/13, paragraph 39) • Compensation of damage caused by packaged HNS is to be covered by contributions from the receivers of bulk solid and liquid chemicals, which have nothing to do with plastic pellet transport, after shipowner's liability, which goes against the "polluters pay" principle (PPR 9/15/8, paragraphs 5 to 7; PPR 10/13, paragraph 40)

Identified impacts	
Identified advantages	<ul style="list-style-type: none"> • Some of the negative effects would be transient and that the effects on the supply chain could be reduced by developing precise transport, packaging and stowage requirements for plastic pellets (PPR 10/13, paragraph 42) • The additional costs of all options appear to be manageable based on feedback from interviewees (PPR 10/13/5, paragraph 11)
Identified limitations	<ul style="list-style-type: none"> • Would impact the entire supply chain and could lead to increased costs due to technical and logistical improvements to the supply chain and transport operations, such as converting existing "non-dangerous goods facilities" used for plastic pellets into "dangerous good facilities," which would require new registrations, compliance management programmes and training of employees (PPR 9/15/9, paragraph 13.3; PPR 10/13, paragraph 41; PPR 10/13/7, paragraph 15) • Would generate intermodal disruptions because of modal disharmony for substances under UN 3077, which are also dangerous goods in land transport regulations for goods meeting the GHS criteria; using the same UN number for goods not meeting the GHS criteria would create confusion and could delay intermodal transport operations (CCC 9/2/4, paragraph 10 and 11; PPR 11/13/3, annex) • Mandated use of UN-specification packaging would generate increased quantities of packaging waste (PPR 9/15/9, paragraph 13.3) • Would significantly increase the quantity of dangerous goods handled, diminish the emphasis on actual dangerous goods, and minimize the effectiveness of the IMDG Code's safety measures, possibly leading to environmental and safety incidents; increased number of freight containers identified on a ship's dangerous goods manifest divert attention away from the actual dangerous goods on board that require special focus to ensure the safety of the ship and crew (PPR 10/13/7, paragraph 17)

A NEW CHAPTER TO MARPOL ANNEX III THAT WOULD PRESCRIBE REQUIREMENTS FOR THE TRANSPORT OF PLASTIC PELLETS IN FREIGHT CONTAINERS WITHOUT CLASSIFYING THE CARGO AS A HARMFUL SUBSTANCE/DANGEROUS GOODS

Description

- The title of MARPOL Annex III would be amended by replacing the words "harmful substances" by the words "harmful substances and plastic pellets".
- A new chapter 2 would be inserted to contain provisions for plastic pellets which would require stowing containers containing plastic pellets "under deck, inboard in sheltered areas of exposed decks, or in the interior portion of container stacks on exposed decks".

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> • Would allow for faster implementation of mandatory carriage requirements and could avoid most of the negative impacts associated with the classification of plastic pellets as dangerous goods/harmful substances. (PPR 10/13, paragraph 44; PPR 12/11/3, paragraph 6) • MARPOL Annex III addresses cargo (PPR 12/11/1, paragraph 11)
Identified limitations	<ul style="list-style-type: none"> • Adding new regulations to MARPOL Annex III for a single product sets a precedent; careful consideration is necessary to avoid any unintended legal consequences and increased administrative burden, due to the risk of duplicating existing dangerous goods provisions. (PPR 10/13, paragraph 45; PPR 12/11/3, paragraph 6) • Would require consequential amendment to the IMDG Code, which defines substances subject to MARPOL Annex III as marine pollutants (PPR 10/13/7, paragraph 19; PPR 11/13/3, annex) • Should plastic pellets be added to the heading of MARPOL Annex III and require special documentation and stowage requirements if they are considered not harmful to the marine environment? (CCC 9/2/4, paragraph 13) • As the material is not harmful to the marine environment and not a dangerous good, enforcement by Member States is not ensured (PPR 11/13/3, annex)
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> • Could include mandatory requirements for safe stowage (PPR 10/3/5, paragraph 11) • Notification according to new chapter 2 of MARPOL Annex III, and stowage as required in new chapter 2: "under deck whenever possible; on deck permitted only in protected locations" (PPR 11/13/3, annex) • Limitations associated with mandated use of UN-specified packagings (e.g. supply chain disruptions, increased waste) would be avoided (PPR 9/15/9, paragraph 13.3; PPR 12/11/7, paragraph 4) • Enables clear identification on the transport document of freight containers containing plastic pellets (PPR 10/13, annex)
Identified limitations	<ul style="list-style-type: none"> • For the exchange of information related to cargo, only FAL Form 2 (cargo declaration) and FAL Form 7 (dangerous goods) are in place. A specific form or EDI format for non-dangerous plastic pellets does not exist (CCC 9/2/4 paragraph 15; PPR 11/13/3, annex) • Approved packaging not required (PPR 11/13/3, annex) and proposals seen so far do not address improved packaging (PPR 10/3/5, paragraph 11)

Considerations of associated conventions	
	<ul style="list-style-type: none"> HNS Convention not applicable unless subject to the IMDG Code (PPR 11/13/1, paragraph 11; PPR 11/13/3, annex; CCC 9/2/4, paragraph 17)
Identified impacts	
Identified advantages	<ul style="list-style-type: none"> None identified
Identified limitations	<ul style="list-style-type: none"> None identified

AMENDMENT TO MARPOL ANNEX III TO SPLIT THE DEFINITION OF HARMFUL SUBSTANCES INTO SUBSTANCES COVERED BY THE IMDG CODE AND SUBSTANCES THAT ARE NOT (E.G. PLASTIC PELLETS) COMBINED WITH NEW REGULATIONS IN MARPOL ANNEX III ON TRANSPORT OF PLASTIC PELLETS OUTSIDE OF THE SCOPE OF THE IMDG CODE

Description

- The existing definition of harmful substances would be amended to include those identified as marine pollutants in the IMDG Code or that meet the criteria in the appendix of MARPOL Annex III (regulation 1.1 of MARPOL Annex III); or identified as plastic pellets
- Two new chapters would be added to MARPOL Annex III, namely chapter 2, which would contain the existing regulations of MARPOL Annex III that apply solely to substances identified as marine pollutants under the IMDG Code or which meet the criteria in appendix I of MARPOL Annex III; and chapter 3, which would contain new regulations that apply solely to plastic pellets

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> Within the remit of IMO (PPR 11/13/1, paragraph 10) Would provide clarity to industry and administrators on how to apply the requirements under MARPOL Annex III for those substances listed under the IMDG Code as well as those not regulated by the IMDG Code (including plastic pellets) (PPR 11/13/1, paragraph 10) Would allow for faster implementation of mandatory carriage requirements and could avoid most of the negative impacts associated with the classification of plastic pellets as dangerous goods/harmful substances (PPR 10/13, paragraph 44)

<p>Identified limitations</p>	<ul style="list-style-type: none"> • MARPOL Annex III addresses cargo (PPR 12/11/1, paragraph 11) • Adding new regulations to MARPOL Annex III for a single product sets a precedent; careful consideration is necessary to avoid any unintended legal consequences and increased administrative burden, due to the risk of duplicating existing dangerous goods provisions (PPR 10/13, paragraph 45) • Would require consequential amendment to the IMDG Code, which defines substances subject to MARPOL Annex III as marine pollutants (PPR 10/13/7, paragraph 19; PPR 11/13/3, annex) • Would undermine the existing classification system under MARPOL Annex III and the existing GHS framework; would lead to confusion and ambiguity in the classification of harmful substances: if plastic pellets are a separate category of harmful substances, should products made from plastic pellets be classified as harmful substances? (PPR 11/13/10, paragraphs 7 and 9) • As stated in document PPR 12/11/1, plastic pellets are not harmful substances/dangerous goods (PPR 12/11/3 paragraph 6) • Allows the potential for packaging provisions beyond "normal conditions of transport" (PPR 12/11/7, paragraph 4) • Plastic pellets are not currently classified as harmful substances (PPR 12/11/3, paragraph 6)
<p>Provisions for packaging, notification and stowage</p>	
<p>Identified advantages</p>	<ul style="list-style-type: none"> • Effective and pragmatic way of enhancing the prevention of pollution by plastic pellets from ships through concrete measures covering documentation, stowage and inspection specific to the transport of this type of cargo (PPR 11/13/8, paragraph 3) • Allows the potential for packaging provisions beyond "normal conditions of transport" (PPR 11/13/8, paragraph 6; PPR 11/13/12, paragraph 12)
<p>Identified limitations</p>	<ul style="list-style-type: none"> • The mechanism proposed for notification is deliberately different to that used to notify the presence of IMDG-classified hazardous substances, which creates a risk that the presence of pellets gets overlooked in both stowage decisions and in the event of an accident (PPR 11/13/12, paragraphs 14 and 15) • Stowage away from the outer stack should be mandatory, not subject to caveats such as "wherever reasonably practicable" (PPR 11/13/12, paragraphs 16 and 17) • Allows the potential for packaging provisions beyond "normal conditions of transport" (PPR 12/11/7, paragraph 4)

Considerations of associated conventions	
	<ul style="list-style-type: none"> The HNS Convention is not applicable to the loss of plastic pellets into the sea if the mandatory instrument chosen does not apply the IMDG Code (PPR 11/13/1, paragraph 11; PPR 11/13/3, annex; CCC 9/2/4, paragraph 17)
Identified impacts	
Identified advantages	<ul style="list-style-type: none"> None identified
Identified limitations	<ul style="list-style-type: none"> None identified

MARPOL ANNEX V

Description

- Amend the title of MARPOL Annex V to include the loss of cargo and equipment from ships and adding applicable new chapters

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> Would help address loss of plastic pellets, containers and fishing gear which pose harm to the marine environment (PPR 10/13, paragraph 46) Would remain under the remit of IMO and MEPC (PPR 12/11/1, paragraph 10)
Identified limitations	<ul style="list-style-type: none"> MARPOL Annex V aims to prohibit the discharge of all garbage, including plastic as a garbage into the sea and its provisions do not fit to address plastic as a cargo (PPR 12/11/3, paragraph 6)
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> Specific provisions can be added as regulations in a new chapter 4 to MARPOL Annex V (PPR 12/11/1, annex)
Identified limitations	<ul style="list-style-type: none"> None identified

Considerations of associated conventions	
	<ul style="list-style-type: none"> • HNS Convention not applicable unless subject to the IMDG Code (PPR 11/13/1, paragraph 11; PPR 11/13/3, annex; CCC 9/2/4, paragraph 17)
Identified impacts	
Identified advantages	<ul style="list-style-type: none"> • None identified
Identified limitations	<ul style="list-style-type: none"> • None identified

NEW CODE FOR PLASTIC PELLETS MADE MANDATORY THROUGH MARPOL ANNEX III or MARPOL ANNEX V

Description

- Developing a freestanding distinct new code and an amendment to MARPOL by adding a provision to incorporate by reference the new code (PPR 12/11/1, paragraph 10)

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> • A dedicated instrument such as a new code could be useful for the carriage of plastic pellets in freight containers and could also potentially include mandatory measures for other plastic-related items such as fishing gear (PPR 12/11/1, paragraph 11) • This option could provide a good basis to introduce mandatory provisions applicable to the safe maritime transport of plastic pellets in freight containers (PPR 12/11/3, paragraph 6) • Would remain under the remit of IMO and MEPC (PPR 12/11/1, paragraph 10)
Identified limitations	<ul style="list-style-type: none"> • None identified
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> • Specific provisions can be added to the new code (PPR 12/11/1, annex)
Identified limitations	<ul style="list-style-type: none"> • None identified

Considerations of associated conventions	
	<ul style="list-style-type: none"> The HNS Convention is not applicable unless subject to the IMDG Code (PPR 11/13/1, paragraph 11; PPR 11/13/3, annex; CCC 9/2/4, paragraph 17)
Identified impacts	
Identified advantages	<ul style="list-style-type: none"> None identified
Identified limitations	<ul style="list-style-type: none"> None identified

NEW CODE FOR PLASTIC PELLETS MADE MANDATORY THROUGH SOLAS

Description

- Developing a mandatory new code through SOLAS by adding provisions applicable to the safe carriage of plastic pellets in freight containers (PPR 12/11/3, paragraphs 6 to 8)

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> This option could provide a good basis to introduce mandatory provisions applicable to the safe maritime transport of plastic pellets in freight containers (PPR 12/11/3, paragraph 6) Would remain under the remit of IMO (PPR 12/11/1, paragraph 10) The development of a new code would mainly address the safe carriage of plastic pellets related to the SOLAS Convention, which is under the remit of the Maritime Safety Committee (MSC) (PPR 12/11/3, paragraph 6)
Identified limitations	<ul style="list-style-type: none"> None identified
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> Specific provisions can be added to the new code (PPR 12/11/1, annex)
Identified limitations	<ul style="list-style-type: none"> None identified

Considerations of associated conventions	
	<ul style="list-style-type: none"> The HNS Convention is not applicable unless subject to the IMDG Code (PPR 11/13/1, paragraph 11; PPR 11/13/3, annex; CCC 9/2/4, paragraph 17)
Identified impacts	
Identified advantages	<ul style="list-style-type: none"> None identified
Identified limitations	<ul style="list-style-type: none"> None identified

NEW ANNEX TO MARPOL

Description

- Developing a new annex to MARPOL (PPR 12/11/1 paragraph 10)

Regulatory considerations	
Identified advantages	<ul style="list-style-type: none"> A dedicated instrument such as a new annex could be useful for the carriage of plastic pellets in freight containers and could also potentially include mandatory measures for other plastic-related items such as fishing gear (PPR 12/11/1, paragraph 11) Would remain under the remit of IMO and MEPC (PPR 12/11/1, paragraph 10)
Identified limitations	<ul style="list-style-type: none"> Would involve developing a new annex and require a more cumbersome acceptance and entry-into-force procedure than would be required under other options (PPR 12/11/1, paragraph 10)
Provisions for packaging, notification and stowage	
Identified advantages	<ul style="list-style-type: none"> Specific provisions can be added to the new annex (PPR 12/11/1, annex)
Identified limitations	<ul style="list-style-type: none"> None identified

Considerations of associated conventions	
	<ul style="list-style-type: none">• The HNS Convention is not applicable unless subject to the IMDG Code. (PPR 11/13/1, paragraph 11; PPR 11/13/3, annex; CCC 9/2/4, paragraph 17)
Identified impacts	
Identified advantages	<ul style="list-style-type: none">• None identified
Identified limitations	<ul style="list-style-type: none">• None identified

ANNEX 4

**DATA TO BE REPORTED TO IMO TO SUPPORT ENHANCED REPORTING
REQUIREMENTS FOR LOST OR DISCHARGED FISHING GEAR**

Ship particulars	
Name	Voluntary
Length	Mandatory
IMO number, registration or call sign	Voluntary
Type of fishing vessel	Mandatory
Event particulars	
Position where the fishing gear has been lost or discharged LAT XX' XX' XX" LONG XX' XX' XX"	Mandatory
Date when the gear has been lost or discharged DD/MM/YYYY	Mandatory
Time when the gear has been lost or discharged, if known	Mandatory
The reason for the discharge or loss, if known	Mandatory
Any measures taken by the fishing vessel to retrieve the gear (Open text)	Mandatory
Fishing gear lost:	
Fishing gear types	Mandatory
Description of the part of the fishing gear (dimensional characteristics, number of units) that was lost or discharged	Mandatory
Approximate quantity of gear lost	Mandatory
Sequential number or other identification marks of the tags attached to the lost or discharged fishing gear, if applicable	Voluntary