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Regulating Ships Beyond Shipping: Applicability of IMO Regulations on GHG Emissions to Fishing Vessels

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Outline

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- GHG emissions from fishing vessels
- Fishing industry facing challenges from climate change impacts
- IMO's existing regulations on fishing vessels
- Discussions

INTRODUCTION

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- Mandate of IMO
  - safe, secure and efficient **shipping**
  - the prevention of pollution from **ships**

As defined in the **MARPOL Convention**, a ship is '*a vessel of any type whatsoever operating in the marine environment and includes hydrofoil boats, air-cushion vehicles, submersibles, floating craft and fixed or floating platforms*' (Article 2(4))

IMO's notion of 'ships' should include fishing vessels, unless otherwise specified for the scope of application

IMO GHG Strategies: 'ships' and 'shipping'

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- IMO Strategy on Reduction of GHG Emissions from **Ships**
- The Strategy is a framework for outlining the future vision for **international shipping**, reaffirming IMO's commitment to reduce GHG emissions from **ships**, and the determination to phase out GHG emissions
- Carbon Intensity Reduction: Aims to reduce carbon intensity across **international shipping** by at least 40% by 2030
- Zero/Near-Zero Emission Technologies: the uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources is expected to represent at least 5%, aiming for 10%, of energy used by **international shipping** by 2030

- MEPC 81 (March 2024) update
  - Tackling climate change - cutting GHG emissions from ships and implementing the 2023 IMO GHG Strategy – possible draft outlines for "IMO net-zero framework" for international shipping, life cycle GHG intensity guidelines
  - Energy efficiency of ships – adoption of 2024 Guidelines on Ship Energy Efficiency Management Plan (SEEMP)

IMO GHG Strategies: 'ships' and 'shipping'

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- Fourth IMO GHG Study 2020
  - The greenhouse gas (GHG) emissions, including carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_2O), expressed in CO_2e, **of total shipping (international, domestic and fishing)** have increased from 977 million tonnes in 2012 to 1,076 million tonnes in 2018 (9.6% increase)
  - Fishing vessels is one of the ship types included in the study report

- UNCTAD report on energy transition of fishing fleets
  - Due to the differences in size, propulsion type and operational patterns, the application of energy efficiency regulations to fishing vessels has been rather limited
  - Fishing vessels primarily emit GHGs through fuel consumption for propulsion and onboard fish processing
  - Energy transition for fishing vessels is critical
  - Recommendations focus on economic, technological, trade, environmental, and social aspects to support a just energy transition, especially in developing countries

GHG EMISSIONS FROM FISHING VESSELS

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- Fishing vessels play a crucial role in the fisheries and seafood value chain but are also significant sources of GHG emissions due to their reliance on fossil fuels, contribute between 0.1% and 0.5% of global carbon emissions, which amounts to up to 159 million tons of carbon emissions annually
  - Severe underestimation of fishing vessel emissions
  - Many small vessels do not have an automatic identification system (AIS) and the International Energy Agency (IEA) data covers only a limited number (33) of countries (UNCTAD, 2024)

FISHING INDUSTRY FACING CHALLENGES FROM CLIMATE CHANGE IMPACTS

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- Fishing fleets face escalating threats from climate change, including rising sea levels and warming waters that impact fishing ports and deplete fish stocks
- Developing countries are particularly vulnerable to these climate change impacts, where small-scale and artisanal fisheries are prevalent
- Fishing industry has not adopted global targets and guidelines for transitioning to cleaner energy

IMO'S EXISTING REGULATIONS ON FISHING VESSELS

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- Cape Town Agreement on safety of fishing vessels
- International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel (STCW-F 1995)
- MARPOL Annex V and London Convention and Protocol (LC/LP)
- IMO+FAO+ILO initiatives on safety of vessels and crews
  - IMO ship identification numbers as unique vessel identifier in FAO's Global Record for fishing vessels
  - Safety Recommendations for Decked Fishing Vessels of Less than 12 metres in Length and Undecked Fishing Vessel

Imbalance in emphasising the safety of ships and crews, and garbage from operations for fishing vessels; no elaboration on how the IMO policies on reducing GHG emissions from ships should be applied to this particular sector

DISCUSSIONS

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- Fishery is a primary sector and element of global food system, and it plays a crucial role in food and nutrition security and provide a source of livelihood for millions of people globally
- GHG emissions from fishing vessels are multifold
  - environmental sustainability
  - equitable transition + livelihoods
- IMO could elaborate more on the duty, mandate and capacity for the regulation of GHG emissions from fishing vessels, and its strategy goals for energy transition for fishing vessels. Alternative fuels offer opportunities for reducing emissions, but further R&D are needed for successful transition and integration
- Developing specific regulations and investing in alternative fuels to contribute to a more sustainable future for the oceans and fishing industry and communities

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THANK YOU!

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