

**National Interest Analysis [2015] ATNIA 3
with attachment on consultation**

Amendments to the Annex of the Protocol of 1997 relating to the *International Convention for the Prevention of Pollution from Ships, 1973*, as modified by the Protocol of 1978 relating thereto

**Amendments to MARPOL Annexes I, II, III, IV and V
RESOLUTION MEPC.246 (66)
Text as Adopted at London on 4 April 2014
[2014] ATNIF 34**

**Amendments to MARPOL Annex VI
RESOLUTION MEPC.247 (66)
Text as Adopted at London on 4 April 2014
[2014] ATNIF 34**

**Amendments to MARPOL Annex I
RESOLUTION MEPC.248 (66)
Text as Adopted at London on 4 April 2014
[2014] ATNIF 34**

**Amendments to MARPOL Annex VI and the NOX Technical Code 2008
RESOLUTION MEPC.251 (66)
Text as Adopted at London on 4 April 2014
[2014] ATNIF 34**

NATIONAL INTEREST ANALYSIS: CATEGORY 1 TREATY

SUMMARY PAGE

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Nature and timing of proposed treaty action

1. The *International Convention for the Prevention of Pollution from Ships 1973* as modified by the *Protocol of 1978* [1988] ATS 29 (which incorporates the terms of the Convention although the Convention itself has not entered into force) and the *Protocol of 1997* [2007] ATS 37 ('MARPOL') are the key international instruments addressing the problem of marine pollution from ships. MARPOL entered into force for Australia on 14 January 1988 (1978 Protocol) and 10 November 2007 (1997 Protocol).
2. MARPOL contains six technical Annexes dealing with, Regulations for the prevention of pollution by respectively: oil (**Annex I**); noxious liquid substances in bulk (**Annex II**); harmful substances in packaged form (**Annex III**); sewage (**Annex IV**); garbage (**Annex V**); and air (**Annex VI**).
3. MARPOL is administered by the International Maritime Organization ('IMO'), a specialised agency of the United Nations. The IMO Committee with responsibility for MARPOL is the Marine Environment Protection Committee ('MEPC').
4. The 66th session of MEPC held in London on 4 April 2014 adopted the following Resolutions (together, 'the Amendments'):
 - (a) Resolution MEPC.246 (66), containing the text of amendments to MARPOL Annexes I, II, III, IV and V ('First Resolution');

- (b) Resolution MEPC.247 (66), containing the text of amendments to MARPOL Annex VI ('Second Resolution');
- (c) Resolution MEPC.248 (66), containing the text of amendments to MARPOL Annex I ('Third Resolution'); and
- (d) Resolution MEPC.251 (66), containing the text of amendments to MARPOL Annex VI and the Nitrogen Oxides (NOx) Technical Code 2008 ('Fourth Resolution').

5. The proposed amendments the subject of the treaty action have been made in accordance with the amendment procedure set out in **Article 16** of MARPOL and will be deemed to be accepted by Australia under the 'deemed' acceptance provisions of **Article 16 (2)(f)**.

6. Under **Article 16 (2)(f)**, the First, Second and Third Resolutions will be deemed to have been accepted by the Parties on 1 July 2015, and the Fourth Resolution will be deemed to have been accepted on 1 March 2015 unless, prior to the respective dates, 'not less than one third of the Parties or Parties, the combined fleets of which constitute not less than 50 per cent of the gross tonnage of the world's merchant fleet', have communicated to IMO their objection to the amendments.

7. Following the deemed acceptance of the amendments, under Article 16 (2)(g)(ii) the First, Second and Third Resolutions will enter into force internationally on 1 January 2016 and the Fourth Resolution on 1 September 2015 (ie. 6 months after acceptance by all Parties). The entry into force will apply to all Parties other than those which have lodged a declaration of non-acceptance.

Overview and national interest summary

First and Second Resolutions

8. The purpose of the First and Second Resolutions is to revise international regulations for the prevention of pollution from ships by including regulations making it mandatory for Parties to MARPOL to be subject to, and facilitate, periodic audits by the IMO to ensure compliance with MARPOL obligations.

9. Acceptance of the amendments to MARPOL contained in the First and Second Resolutions is in the national interest as it will increase compliance with MARPOL and thereby reduce risks of marine pollution from vessels in Australian waters and beyond.

Third Resolution

10. The purpose of the Third Resolution is to require all oil tankers to be fitted with stability instruments capable of verifying vessel stability under intact and damage conditions, from January 2016. Oil tankers constructed before 1 January 2016 must comply with this requirement at the first scheduled renewal survey of the ship after 1 January 2016, but not later than 1 January 2021. The amendments also waive the requirement for some oil tankers to be fitted with a stability instrument under certain circumstances.

11. Acceptance of the amendments to MARPOL contained in the Third Resolution is in the national interest as mandatory stability instruments for oil tankers will increase vessel and personnel safety, and reduce risks to the environment in Australian and other waters.

Fourth Resolution

12. The purpose of the Fourth Resolution is to clarify interpretations and application of regulations, including emissions calculations related to the application of the Energy Efficiency Design Index ('EEDI'), and to provide for the necessary requirements, such as fuel gas composition, fuel and engine parameters and calculation factors, in order to calculate the NOx emission of dual fuel engines and certify such engines.

13. The Resolution would, in effect, extend the 1 January 2016 application of the NOx Tier III emission limits in two circumstances. Firstly, for ships with marine diesel engines operating in any newly adopted emission control area ('ECA'), only ships constructed on or after the date of adoption of such an ECA, or a later date as agreed by Parties to MARPOL, would need to comply with NOx Tier III emission limits. Secondly, MARPOL would be amended to specify that NOx Tier III standards will not apply to a marine diesel engine installed on a ship constructed prior to 1 January 2021, of less than 500GT that is greater than 24m in length when specifically designed and used solely for recreational purposes. The amendments to the EEDI will extend the application of the MARPOL air pollution standards to additional ship types now that emissions calculations through the EEDI are available.

14. Acceptance and implementation of the amendments to MARPOL contained in the Fourth Resolution will allow the shipping sector to play its part in meeting agreed global goals and the Australian Government's international commitments to address climate change and reduce greenhouse gas emissions.

Reasons for Australia to take the proposed treaty action

First and Second Resolutions

15. A mandatory audit scheme is a key tool for assessing Member States' performance in meeting their obligations and responsibilities as flag, port and coastal State under the relevant IMO treaties and offering the necessary assistance, where required, for them to meet their obligations fully and effectively.

16. Australia is a long-standing supporter of the institutionalisation of the audit scheme. Australia was audited under the Voluntary IMO Member State Audit Scheme in 2008. When the IMO Instruments Implementation Code ('III Code') was originally introduced, it was agreed by the IMO that the audit scheme would eventually be mandatory.

17. In making the III Code mandatory the intention is to not only ensure member States are adhering to mandatory requirements, but also to give opportunity to identify capacity building needs and offer technical assistance to member States as required.

Third Resolution

18. The stability instrument will provide oil tankers with the ability to respond in real time to changing circumstances, such as a damaged cargo hold, and reduce the risk of a maritime incident such as capsizing.

19. In 2010 an IMO study found that 77 oil tankers and 84 chemical carriers could not demonstrate compliance with loading requirements and damage stability rules. Although Australian oil tankers have not been involved in recent oil spill incidents, if a non-compliant vessel were to be involved in a collision or grounding, pollution or loss of life would be likely.

20. Since 2009, there have been three major foreign-flagged ship incidents which spilled approximately 370 tonnes of oil into Australian waters. Although these were not attributed to lack of stability instruments installed on board, the magnitude of the spill demonstrates the potential harm to the marine environment and cost of clean-up.

Fourth Resolution

21. Parties to the *Kyoto Protocol* to the United Nations Framework Convention on Climate Change [2008] ATS 2 have agreed to pursue global sectoral approaches to address greenhouse gas emissions from international maritime transport through the IMO. In 2011, the IMO adopted amendments to MARPOL **Annex VI** (Resolution MEPC.203 (62)) which introduced mandatory CO₂ emissions standards, termed a “required EEDI”, for new ships built after 1 January 2013 used in international trade.

22. In **Report 124** of April 2012, the Joint Standing Committee on Treaties (‘JSCOT’) supported the amendments to MARPOL **Annex VI** contained in MEPC 203 (62) to include regulations on energy efficiency for ships and recommended that binding treaty action be taken.

23. These amendments represented the first mandatory greenhouse gas emission reduction measures for an international industry sector and helped to close a gap in the existing international climate change framework, which excluded the international shipping sector from national emissions reduction targets. Adoption of the amendments is expected to drive the uptake of energy-efficient technologies by the international shipping sector. Adoption of the measures by the international shipping sector is expected to remove between 45 and 50 million tonnes of CO₂ from the atmosphere annually by 2020, compared with business as usual.

24. The proposed amendments for Resolution MEPC.251 (66) were foreshadowed in National Interest Analysis [2011] ATNIA 34 and will build upon the existing mandatory emission standards, thereby further contributing to the reduction of harmful air pollutants that have been linked to negative environmental and health effects.

25. These energy efficiency regulations will also help Australia to meet its target to reduce greenhouse gas emissions by five per cent below 2000 levels by 2020. The Australian Government’s Emission Reduction Fund White Paper, drawing on data from Australia’s National Inventory Report, estimates that emissions from the transport sector (road transport, rail, domestic aviation and domestic shipping) account for 16 per cent of Australia’s total emissions. Application of the EEDI regulations to ships used in international trade will also lead to efficiencies and greenhouse gas emissions reductions for those ships also engaged in domestic shipping activities.

26. If the proposed amendments to **Annex VI** to MARPOL are not implemented in Australia, there is a material risk that Australian international ships built after 1 January 2013 would be less energy efficient than foreign-flagged ships that adhere to the new IMO regulations. Consequently, these Australian ships would be unable to trade internationally if the proposed amendments were implemented by other nations or they sought to operate in a designated ECA.

Obligations

27. If the amendments to MARPOL contained in the First to Fourth Resolutions are approved by JSCOT and binding treaty action is recommended, the below requirements will be mandated at international law:

First and Second Resolutions

28. **Annexes I, II, III, IV, V and VI** are amended by the First and Second Resolutions to include a new Chapter with regulations that provide that Parties shall use the provisions of the III Code in the execution of their obligations and responsibilities contained in each Annex. These amendments would make it mandatory for every Party to be subject to periodic audits by the IMO to verify compliance with and implementation of each Annex. Furthermore, each Party would be responsible for facilitating the conduct of the audit and implementation of a programme of actions to address the findings, based on the guidelines developed by the IMO.

Third Resolution

29. **Regulation 28** of MARPOL **Annex I** sets out subdivision and damage stability criteria for oil tankers. **Regulation 28** is amended by the Third Resolution to include a new paragraph 6, which would require that from 1 January 2016, all oil tankers must be fitted with a stability instrument capable of verifying compliance with intact and damage stability requirements. Oil tankers constructed before 1 January 2016 must comply with this regulation at the first scheduled renewal survey of the ship after 1 January 2016, but not later than 1 January 2021.

30. The stability instrument must be approved by the 'Administration' (in Australia, the Australian Maritime Safety Authority) having regard to the performance standards recommended by IMO.

31. **Appendix II** of MARPOL **Annex I** provides the Form of International Oil Pollution Prevention ('IOPP') Certificate and Supplements. Form B of **Appendix II** contains the Record of Construction and Equipment for Oil Tankers. The Third Resolution will amend Form B to reflect the amendment to **Regulation 28**.

32. **Regulation 3** of MARPOL **Annex I** gives an Administration the option to waive the requirement for some oil tankers to be fitted with a stability instrument under certain circumstances.

Fourth Resolution

33. **Regulation 2** of MARPOL **Annex VI** is amended by the Fourth Resolution to clarify interpretations of hybrid propulsion and to provide definitions for: 'Gas carrier', 'LNG carrier', 'Cruise passenger ship', 'Conventional propulsion', 'Non-conventional propulsion', 'Cargo ships having ice-breaking capability', and a ship 'delivered on or after 1 September 2019'.

34. **Regulation 5** of MARPOL **Annex VI** is amended by the Fourth Resolution to define a 'new ship', which would clarify the existing text to ensure the original intent of the MARPOL regulation in relation to ship surveys is reflected. The clarification is consistent with Australia's existing interpretation of the regulation that the Energy Efficiency Design Index ('EEDI') applies to new ships.

35. **Regulation 13** of MARPOL Annex VI provides provisions for acceptable nitrogen oxide ('NOx') emissions from ships, with Tiers I, II, and III setting steadily more restrictive emission requirements. Each tier captures ships constructed on or after different construction dates, with Tier III applying to ships constructed on or after 1 January 2016 operating in a designated ECA. The amendments to **Regulation 13** under the Fourth Resolution will mean the NOx emission limits under Tier III standards in any newly adopted ECA will only apply to ships with marine diesel engines constructed on or after the date of adoption of a new ECA, or a later date as specified in the amendment designating a new ECA, whichever is later.

36. **Regulation 13** is amended by the Fourth Resolution to specify that NOx Tier III standards will not apply to a marine diesel engine installed on a ship constructed prior to 1 January 2021 of less than 500GT that is greater than 24m in length when it has been specifically designed, and is used solely, for recreational purposes.

37. The NOx Technical Code 2008 ('the Code') controls emissions of nitrogen oxides from marine diesel engines. The Code is amended by the Fourth Resolution to provide a definition of a marine diesel engine and to clarify the application of **Regulation 13**, including measurement procedures, for engines operating in gas and fuel modes. The amendments set out procedures for NOx emission measurements on a test bed, and for demonstrating compliance with NOx emission limits on board, including identifying relevant ISO standards and updating technical data in calculation and parameter tables.

38. **Appendix I** to MARPOL Annex VI provides the Form of International Air Pollution Prevention ('IAPP') Certificate. The length (L) metres requirement within the Supplement to IAPP Certificate has been expanded to include the amendment to **Regulation 13**.

39. **Regulation 19** of MARPOL Annex VI provides the application of regulations on energy efficiency for ships. **Regulation 19** is amended by the Fourth Resolution to exclude ships not propelled by mechanical means, and platforms including Floating Production, Storage and Offloading Facilities ('FPSOs') and Floating Storage Units ('FSUs') and drilling rigs, regardless of their propulsion. **Regulation 19** is also amended to specify that Attained Energy Efficiency Design targets do not apply to ships which have non-conventional propulsion, except in the case of cruise passenger ships and LNG carriers delivered on or after 1 September 2019. **Regulation 19** will also clarify that **Regulations 20** and **21** shall not apply to cargo ships having ice-breaker capability.

40. **Regulation 20** of MARPOL Annex VI provides regulations for calculating the Attained Energy Efficiency Design Index ('Attained EEDI') of ships. **Regulation 20** is amended by the Fourth Resolution to expand vessel categories for the Attained EEDI calculation to include the addition of LNG carriers and Cruise passenger ships.

41. **Regulation 21** of MARPOL Annex VI provides the Required EEDI provisions for ships. The EEDI is a non-prescriptive design-based measure which aims to improve the energy efficiency of ships and reduce greenhouse gas emissions from international shipping. For example, ships may meet the EEDI through using efficient engines and propulsion systems. Ships calculate their EEDI based on a formula and guidelines endorsed by the MEPC. The EEDI regulations stimulate continued fuel efficiency of new ships by tightening standards at each phase of the EEDI. This is expected to lead to a reduction in operating costs for the life of the vessel.

42. **Regulation 21** is amended by the Fourth Resolution to expand the vessel categories for Required EEDI to include Roll-on-roll-off ('Ro-ro') cargo ships (vehicle carrier), Ro-ro cargo ships, Ro-ro passenger ships, LNG carriers, and Cruise passenger ships.

Implementation

First and Second Resolutions

43. No legislative amendment is required to implement the First and Second Resolutions into Australian domestic law.

44. It will be the responsibility of Australia as a Party to MARPOL to facilitate the conduct of the mandatory audit required under the amendments and to address the findings of such audit.

Third Resolution

45. Marine Order 91 (Marine pollution prevention — oil) 2014, made under the *Navigation Act 2012* (Cth), requires a vessel to comply with the requirements of **Annex I** of MARPOL and does not require amendment to give effect to the Third Resolution.

Fourth Resolution

46. Marine Order 97 (Marine pollution prevention — air pollution) 2013, made under the *Navigation Act 2012*, implements the relevant Regulations of **Annex VI** of MARPOL and does not require amendment to give effect to the Fourth Resolution.

Costs

First and Second Resolutions

47. Implementation of the First and Second Resolutions is expected to have negligible administrative impact and compliance costs are likely to remain unchanged.

48. The Office of Best Practice Regulation ('OBPR') advised the Department of Infrastructure and Regional Development ('the Department') on 26 November 2014 and 9 January 2015 respectively that a Regulation Impact Statement ('RIS') is not required for either the First or Second Resolution.

Third Resolution

49. The OBPR advised the Department on 16 January 2015 that a RIS is not required for the Third Resolution as the amendment is likely to have minor regulatory impacts on businesses, community organisations and individuals.

50. The Australian Maritime Safety Authority ('AMSA') estimates that these stability instruments would cost between \$5000 and \$10000, which is not considered a substantial cost in the context of a ship. As stability instruments will be required on all oil tankers, it will not create a competitive disadvantage for Australian vessels; there are only four Australian registered oil tankers operating.

Fourth Resolution

51. The OBPR advised the Department on 16 January 2015 that a RIS is not required for the Third Resolution as the amendment is likely to have minor regulatory impacts on businesses, community organisations and individuals.

52. The proposed EEDI amendments would impose minimal or no cost on Australia as the EEDI regulations would only apply to new ships engaged in international trade.

53. It is also expected that the amendments to the application of the NOx Tier III emission limits will incur minimal to no cost, as they only apply to ships with marine diesel engines constructed on or after 1 January 2016 operating in a designated ECA.

54. The choice of technologies to use in a specific ship design to meet the required EEDI target is left to the industry. In 2011, a National Interest Analysis ('NIA') of MARPOL Annex VI amendments to Chapters 1 and 2 suggested that ships can reduce their CO2 emissions by as much as 25 percent by adopting better hull designs, energy efficient technologies and energy efficient operations. The proposed amendments seek to influence expeditious uptake of these technologies by expanding the ship types required to meet the mandatory emissions standards for new ships. The measures do not discriminate between countries.

Future treaty action

55. Any Future amendments to MARPOL (including the Protocols and Annexes) must be effected in accordance with the amendment provisions set out in MARPOL (Article 16 - Convention, Article VI – 1978 Protocol and Article 4 -1997 Protocol).

56. Article 16 contains various amendment mechanisms, including amendment after consideration by the IMO (Article 16 (1) and amendment by a Conference (Article 16 (2) Various 'deemed acceptance' procedures for amendment after consideration by the organisation are set out in Article 16 (2)(f) with specific conditions for entry into force set out in Article 16 (2)(g).. The Parties may lodge a declaration of acceptance or objection to an amendment with the Secretary General of the IMO (Article 16(9)).

57. Any amendment to MARPOL will constitute a treaty action and therefore be subject completion of Australian domestic legal and treaty requirements prior to entry into force.

Withdrawal or denunciation

58. MARPOL does not contain any specific provision for withdrawal. In accordance with Article 56 (1) of the *Vienna Convention on the Law of Treaties*, a treaty which does not provide for withdrawal is not subject to withdrawal unless it is established that the parties intended to admit the possibility of withdrawal or a right of withdrawal may be implied by the nature of the treaty. Any future withdrawal from MARPOL by Australia would be subject to domestic treaty process.

59. Under Article 14 of MARPOL, Annexes III, IV and V are deemed 'Optional Annexes'. MARPOL and any of its Optional Annexes may be denounced by the Parties to the Convention at any time after the expiry of five years from the date on which the Convention or such Annex enters into force for that Party (Article 18 and Article VII).

60. As Annexes I and II are not Optional Annexes, they may not be denounced by any Party.

61. **Annex VI** was added by the 1997 Protocol to MARPOL ([2007] ATS 37) and contains parallel procedures and conditions for denunciation to those set out in the 1978 Protocol. Under **Article 7 (1)** the 1997 Protocol (including **Annex VI**) may be denounced by any Party at any time after the expiry of five years from the date on which the Protocol enters into force for that Party.

Denunciation under either Protocol is effected by the deposit of an instrument of denunciation with the Secretary-General of the IMO (**Article VII (2)** 1978 Protocol, **Article 7 (2)** 1997 Protocol). Any denunciation would take effect 12 months after receipt of the notification of denunciation by the Secretary-General on or after the expiry of any other longer period which may be indicated in the notification.

62. Any decision to denounce MARPOL under either the 1978 Protocol (**Articles 18 and VII**) or the 1997 Protocol (**Article 7**) would be subject to Australia's domestic treaty process, including tabling and consideration by the JSCOT.

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**ATTACHMENT ON CONSULTATION
RESOLUTION MEPC.246 (66); RESOLUTION MEPC.247 (66); RESOLUTION
MEPC.248 (66); and RESOLUTION MEPC.251 (66)**

Adopted at London on 4 April 2014

**Amendments to the Annex of the Protocol of 1997 relating to the International
Convention for the Prevention of Pollution from Ships, 1973, as modified by the
Protocol of 1978 relating thereto
[2015] ATNIA 3**

CONSULTATION

1. Consultation during the development of the proposed amendments to the Protocol of 1978 relating to the *International Convention for the Prevention of Pollution from Ships 1973* ('MARPOL') was undertaken with a number of industry organisations. The Department of Infrastructure and Regional Development ('Department'), through the Australian Maritime Safety Authority ('AMSA'), has a history of good positive engagement with industry. Consultation by the Department primarily occurred with the following peak industry bodies:
 - a. **The Australian Shipowners Association ('ASA')**: ASA represents Australian companies who own or operate international and/or domestic trading ships, cruise ships, domestic towage and salvage tugs, dredges, scientific research vessels and offshore oil and gas support vessels. ASA also represents employers of the Australian and international maritime labour.
 - b. **The Australian Shipbuilding and Repair Group ('ASRG')**: ASRG is the recognised peak industry body representing and promoting the capability of the Australian shipbuilding and repair industry sectors to the domestic and international market.
 - c. **Shipping Australia Limited ('SAL')**: SAL is a peak industry body whose members cover many of the major Australian and international ship owners, operators and agency companies involved in bulk, tanker, general cargo shipping, container, passenger and tramp trades.

RESOLUTION MEPC.246 (66) and RESOLUTION MEPC.247 (66)

2. These proposals would require the Australian Government (in this case AMSA) to be subject to periodic mandatory audits by the International Maritime Organization to verify Australia's regulations and compliance measures give effect to the International Convention for the Prevention of Pollution from Ships 1973 (MARPOL). The proposals would not impose any regulatory burden or cost on industry.

RESOLUTION MEPC.248 (66)

3. During the development of these amendments at the 55th Session of the IMO Sub-Committee on Stability and Load Lines and on Fishing Vessels Safety (now the Sub-Committee on Ship Design and Construction) the Australian Shipowners Association,

Shipping Australia Limited and Lightning Naval Architecture were consulted. No significant issues were raised by these stakeholders during this consultation.

RESOLUTION MEPC.251 (66)

4. Australian industry was broadly supportive of a 2016 effective date for the NOx Tier III engine standards.
5. In March 2014, prior to MEPC 66, SAL expressed concerns regarding the lack of available technology to reasonably achieve the requirements of the NOx Tier III standards. However, in August 2014, following MEPC 66, SAL indicated that Australian trade will not be disadvantaged provided our changes are consistent in scope and timing with international changes.
6. ASA has consistently supported the 2016 effective date for the NOx Tier III engine standards. Although they advised they are not in a position to comment on the suitability of the amendments to **Regulation 13** of **MARPOL Annex VI**, noting that only a few of their members currently operate within the United States NOx Emission Control Area, they provided an assessment of implications for the industry. Prior to MEPC 66, they expressed concern that delaying the 2016 effective date of the NOx Tier III standards would adversely affect those who have already invested in the technology. This would undermine the commercial drivers responsible for developing the technology required to achieve the Tier III standards.
7. ASRG support the 2016 date for NOx ECA. ASRG notes some countries have invested substantially in infrastructure prior to the 2016 start date and industry members who have invested in research and development and capital for infrastructure changes should not be penalised. ASRG did not agree with the proposal to extend the NOx Tier III effective date to 2021 specifically for super yachts.
8. The Australian International Marine Export Group and Superyacht Australia, the peak body representing the Australian marine export and super yacht industries, expressed concern the installation of selective catalytic reduction ('SCR') technology to achieve Tier III NOx emission standards, as recommended from the review under **Regulation 13.10** of **MARPOL Annex VI**, could result in notable size and cost impacts and may negatively impact the commercial viability of the global super yacht sector. In April 2014, at MEPC 66, the Committee agreed that relevant industries in the large yacht sector would need time to comply with NOx Tier III emission standards and therefore established the five-year delay, until 2021, for large yachts to comply.

The impact on the Australian shipping industry of amendments to the EEDI provisions are likely to be mainly felt by the Australian ship building industry. ASRG support amendments to apply the EEDI requirements to other ship types, including ro-ro vessels, LNG carriers and cruise passenger ships (with non-conventional means of propulsion). Australia's ship building industry is small and predominately builds vessels for domestic use with few Australian companies building ro-ro vessels for operation outside Australia, however the EEDI requirements will also apply to their foreign competitors.