





GHG Intensity Regulatory Compliance

- Clean Energy Supply -

01 /INTRO



FUTURE SHIPPING TEAM

REGULATORY INFLUENCES ON ENERGY CHOICE



02° / MIDTERM MEASURES

MID TERM MEASURES IMO GHG FUEL INTENSITY MEASURES (GFI)



IMO MEPC 83 APPROVALS AND ADOPTIONS



• MEPC 83 majority approval of **new Marpol Annex VI Ch 5** (from 2028)

1) Goal based fuel standards (GFI) (incl reporting)

2) Implementing an IMO fund (name under discussion)

3) Creating an Emission Trading System (ETS) mechanism to support the use of ZNZ fuels

4) IMO DCS data review (additional data, revised BDN data (incl GHG intensity/feedstock info etc etc), data transparency

5) Measurement methods of CH4 and N2O in emissions

- Adoption of NOx code amendments
 - Combined Tier II and Tier III operation of engines
 - Configuration of systems with different emission standards
 - Guidelines for SCR systems
- CII new reduction factors 2027 2030 (13,625%/16,25%/18,875%/21.5%)
- SEEMP guidelines (underway vs not underway)
- EEDI revisions after May 2026 new construction

MEPC 83 mid-term strategy GHG



Compliance units; banking & transfer & voluntary cancel

Compliance units according to GFI att reduction compared to the GFI target SU (surplus unit) = overcompliant DU (deficit unit) = undercompliant

SU/DU units can be banked/transferred/paid

GFI attained = attained GFI is a weighted average of GHG intensity of all energy sources used by a ship in a year

Based on annual CO2etonne/TJ (WtW GHG emissions)

- $\hfill\square$ GHG intensity of the energy source used
- Total energy used of that energy source

Total annual energy used of all energy sources

GFI target consisting of Direct Compliance Target and Base Compliance Target (resp Tier I and Tier II) Target based on GHG reduction strategy Tier I deficit: USD 100 per ton CO2 eq (2028-2030) Tier II deficit USD 380 per ton CO2 eq (2028-2030)

Possible thresholds for use of ZNZ fuels of 10-25% until 2034 (for early adoptors)

Responsibility: ISM manager (at reporting date).



Levy/contribution between 18,75 – 150 USD/ton CO2eq LCA (WtW GHG emissions)

IMO Fund

Name: 'Net -Zero Fund

Independent fund governed by Governance Board with balanced gender and geographic representation Overseen and audited by MEPC

Revenue from contributions, expenditures for credits, technical developments and compensating effects of GHG and...AWARDING ZNZ ACHIEVERS WHEN 19 gCO2e/MJ IS ACHIEVED

Data

IMO DCS – MARPOL VI chapter 4, reg 27 new appendixes:

Annual fuel(s) consumption/NM incl EEDI, EEXI and CII data New additional data on BDN

WtW GHG intensity + Lower Calorific Value

For calculations:of GFI att and GFI target Baseline eq: 93.3 gCO2e/MJ (=LSFO 2025/ LSFO+MGO 2009)

02° / MID TERM MEASURES

MID TERM MEASURES

Costs are dependent on:

- GHG/Fuel compliance strategy
- GHG intensity
- Blending
- WtT GHG intensity
- Composition of the fleet
- Trading
- Economic value of Surplus Units



IMO MEPC 83 IMPACT





- **Direct compliance**, surplus units = (77.44 annual GFIattained) × Energy_{total}
- Tier 1 compliance deficit = (77.44 annual GFlattained) × Energy_{total}
- Tier 2 compliance deficit = (89.57- annual GFlattained) × Energy_{total} + Tier 1 compliance deficit = 12.13 × Energy_{total}
- ZNZs below the value may receive rewards from IMO Net-Zero Fund for the ZNZs used (ZNZs means zero or near-zero GHG emission technologies, fuels and/or energy sources)

03° / TOC & TCO

TOTAL OPERATING COSTS INFLUENTIAL FACTORS IMO STRATEGY & EU



Note: Estimate of 2008 WTW absolute emissions and projections of future energy demand based on IMO 3rd and 4th GHG Studies.

¹⁶ Based on 2022 EU MRV data; assumes 2022 levels of overcompliance is pooled and that blended biofuel ratio is 70% fossil fuel; 30% biofuel ¹⁷ IMO: 2023 Revised Strategy on the Reduction of GHG Emissions from Ships

Re: UMAS - Comparison of FuelEU and indicative IMO 2023 Revised GHG Strategy



IMO GHG STRATEGY AND EU ETS / FUEL EU

Avoidance of double pricing

- EU now will review the IMO mid term measures (International) to reach the European targets
- FUEL EU will report to EU parliament
- Then alignment is sought in the form of a transition or removal of EU payments





FUELS OPERATIONAL COSTS (STUDIES ONGOING)





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TOTAL OPERATING COST

GHG COMPLIANCE STRATEGY

(FOR SHIPOWNERS AND CHARTERERS)



OPERATIONAL LIFE TIME SERVICE COSTS

 Close to 50% of new construction orders are alternative fuel ready (Clarkson – World Fleet Register)



- Choice of grey, green or e- alternative fuels is dependent on IMO/EU GHG levy on GHG WtW intensity.
- A lifetime fuel compliance strategy
 - based on fuel costs and emission intensity
 - determined by the IMO/EU responsible stakeholder (bunker supply contract)

Figure 34: Fuel cost and emissions intensity in terms of cost abatement (\$ per kg of CO2e abated per GJ) versus LFSO



Note: Outputs reflect scenario where carbon price is set to zero and no subsidies have been applied.

Re: UMAS – Building a business case for green shipping corridors Febr 2025

03° / TOC & TCO

TOTAL COST OF OWNERSHIP INFLUENTIAL FACTORS





EARLY COMPLIANCE COSTS VS COMPLIANCE STRATEGY COSTS





- Overcompliance on IMO and EU GHG Strategy Goals is expensive but with good pooling/banking/trading perspectives.
- Cheapest compliance implicates uncertainty and controls ... requires a fuel strategy over the lifetime of the vessel based on IMO/EU mechanisms
- Total Cost of Ownership is critical for choosing a LEASE contract or a PURCHASE contract (based on 15 yrs service)



Note: Based on 24,000 teu containership sailing between East Asia to Europe consuming approximately 30,000 tonnes LSFO equivalent per annum. Cost assumptions are detailed in the Appendix.

Re: UMAS – Building a business case for green shipping corridors Febr 2025





KEY TAKE-AWAYS FOR GHG INTENSITY COMPLIANCE







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