

Merchant Shipping Directorate



INTERIM GUIDANCE ON THE USE OF BIOFUELS UNDER REGULATIONS 26, 27 and 28 OF MARPOL ANNEX VI (DCS AND CII)

Technical Notice MARPOL.14

Notice to Ship-owners, Ship Operators, Managers, Masters, Owners' Representatives and Recognized Organizations

The Directorate wishes to draw the attention of all concerned to <u>MEPC.1/Circ.905</u> containing interim guidance on the use of biofuels under regulations 26, 27 and 28 of MARPOL Annex VI (DCS & CII).

The 2022 Guidelines on operational carbon intensity indicators and the calculation methods (resolution MEPC.352(78) CII Guidelines, G1) provide the possibility for the CO_2 Emission Conversion Factor (Cf) to be obtained from the fuel oil supplier, supported by documentary evidence in case the type of the fuel oil is not covered by the relevant guidelines.

Pending the development of the comprehensive method to account for well-to-wake GHG emissions and removals based on the Guidelines on life cycle GHG intensity of marine fuels (LCA Guidelines) (resolution MEPC 376(80)), biofuels that have been certified by an international certification scheme, meeting its sustainability criteria, and that provide a well-to-wake GHG emissions reduction of at least 65% compared to the well-to-wake emissions of fossil MGO of 94 g $CO_2 e/MJ$ (i.e. achieving an emissions intensity not exceeding 33 g $CO_2 e/MJ$) according to that certification, may be assigned a Cf equal to the value of the well-to-wake GHG emissions of the fuel according to the certificate (expressed in g $CO_2 e/MJ$) multiplied by its lower calorific value (LCV, expressed in MJ/g) for the purpose of regulations 26, 27 and 28 of MARPOL Annex VI for the corresponding amount of fuels consumed by the ship. In any case, the Cf value of a biofuel cannot be less than 0. For blends, the Cf should be based on the weighted average of the Cf for the respective amount of fuels by energy.

A Proof of Sustainability or similar documentation from a recognized scheme should be provided together with the Bunker Delivery Note, to facilitate the verification of the reported biofuel consumption.

As proof of sustainability this Administration accepts certification in terms of ICAO's Approved Sustainability Certification Schemes¹ and the CORSIA Sustainability Criteria (chapter 2) for CORSIA Eligible Fuels. In addition, this Administration accepts certification schemes with similar sustainability criteria such as those recognized under the EU Renewable Energy Directive².

Hal Lija LJA 2021, Malta



Merchant Shipping Directorate ISO 9001:2015 certified

¹ <u>https://www.icao.int/environmental-protection/CORSIA/Documents/ICAO%20document%2004%20-%20Approved%20SCSs.pdf</u>

² <u>https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/voluntary-schemes_en</u> Malta Transport Centre



Merchant Shipping Directorate



Technical Notice MARPOL.14 Page 2 of 2

Biofuels not certified as "sustainable" or not fulfilling the well-to-wake emission factor criterion above should be assigned a Cf equal to the Cf of the equivalent fossil fuel type.

The Ship Energy Efficiency Management Plan (SEEMP) Part III may have to be revised to take account of the lower Cf in the approved CII calculation method.

This guidance should be considered as an interim simplified method until a more comprehensive method is developed to calculate a fuel's Emission Conversion Factor reflecting its well-to-wake GHG emissions and removals based on the LCA Guidelines. This interim guidance shall cease to apply immediately upon operationalization of a well-to-wake GHG methodology through the LCA Guidelines. This Technical Notice should be read in conjunction with Technical Notice MARPOL.12 Rev.1.

Merchant Shipping Directorate

23 October 2023

Malta Transport Centre Hal Lija LJA 2021, Malta



Merchant Shipping Directorate ISO 9001:2015 certified