

SUB-COMMITTEE ON SHIP DESIGN AND  
CONSTRUCTION  
10th session  
Agenda item 5

SDC 10/5/8  
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**REVIEW OF THE 2014 GUIDELINES FOR THE REDUCTION OF UNDERWATER NOISE  
FROM COMMERCIAL SHIPPING TO ADDRESS ADVERSE IMPACTS ON MARINE LIFE  
(MEPC.1/CIRC.833) (2014 GUIDELINES) AND IDENTIFICATION OF NEXT STEPS**

**Comments on document SDC 10/5**

**Submitted by FOEI, WWF, IFAW, Pacific Environment and CSC**

**SUMMARY**

*Executive summary:* This document comments on the report of the Correspondence Group (CG) on the Review of the 2014 Guidelines for the Reduction of Underwater Noise from Commercial Shipping to Address Adverse Impacts on Marine Life (MEPC.1/Circ.833) and identification of next steps and provides proposals to optimize collective learning in the experience-building phase and to ensure appropriate consideration of the proposed action plan developed by the CG.

*Strategic direction,  
if applicable:* 1

*Output:* 1.16

*Action to be taken:* Paragraph 17

*Related documents:* MEPC 75/14; MEPC 76/15; SDC 9/16; MEPC 80/17; SDC 10/INF.3, SDC 10/5; SDC 10/5/5 and SDC 10/5/7

**Introduction**

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.5) and comments on the report of the Correspondence Group (CG) on the Review of the Underwater Noise Guidelines (SDC 10/5), as well as on proposals submitted by the United States (SDC 10/5/5) and the Inuit Circumpolar Council (SDC 10/5/7).

**Background**

2 In July 2023, MEPC 80 approved the revised *Guidelines for the reduction of underwater noise from commercial shipping to address adverse impacts on marine life* (MEPC.1/Circ.833) (Revised Guidelines), which entered into effect on 1 October 2023, as well as the *Guidelines for underwater radiated noise reduction in Inuit Nunaat and the Arctic* (MEPC.1/Circ.907), which were circulated by the Secretariat on 3 October 2023. MEPC 80

also approved the convening of an expert workshop on the relationship between energy efficiency and underwater noise from ships, which was held on 18-19 September 2023 at IMO Headquarters. The outcomes of the workshop were reported by the Secretariat in document SDC 10/INF.3.

3 MEPC 80 also endorsed the updated work plan submitted by SDC 9 and encouraged interested Member States and international organizations to submit lessons learned/best practices in the implementation of the Revised Guidelines to the Committee through MEPC 85, including outreach and awareness efforts to support uptake with a view to identify necessary adjustments/modifications to the Guidelines (MEPC 80/17, paragraph 10.4).

4 SDC 9 established a Correspondence Group to carry out the remaining work to, *inter alia*, identify next steps to further prevent and reduce URN from ships (SDC 9/16, paragraph 5.18.2). The final report of the CG includes a list of suggested next steps, presented in the format of an action plan (SDC 10/5, paragraph 15.2). The first task listed in the proposed action plan is the launch of a three-year experience-building phase of the Revised Guidelines, with a footnote noting this task reflects MEPC 80's invitation for Member States and interested organizations to submit lessons learned/best practices in the implementation of the Revised Guidelines (SDC 10/5, annex 2).

### **Structuring the experience-building phase to optimize learning and inform next steps**

5 The co-sponsors note that the Organization has previously approved experience-building phases (EBP) to build knowledge around its work outputs, including, for example, a recent EBP to monitor and improve the International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (MEPC.290(71)). In that case, the EBP was defined and structured into three phases – a data gathering phase, a data analysis phase and a review phase to inform next steps. Each of the phases had a defined plan that set out specific objectives for the phase, data gathering templates for Member States to use, relevant timelines, and organizational arrangements (BWM.2/Circ.67/Rev.1 and BWM.2/Circ.79).

6 At present, the Sub-Committee has not envisaged a structure that can ensure the EBP of the Revised Guidelines is optimized and fit for purpose. The co-sponsors believe that an EBP plan is necessary to, *inter alia*:

- .1 agree upon the primary goals of the EBP of the Revised Guidelines;
- .2 define key areas where experience-building is urgently needed (e.g. with URN Management Planning, URN measurements before and after measures are adopted, URN benefits associated with energy efficiency measures, etc.);
- .3 delineate the type and format of data and information to facilitate a synthesis of lessons learned and experience gained;
- .4 create an acceptable approach for analysing such data and information (and determine who will conduct such an analysis, whether the Secretariat or via external support); and
- .5 propose a process for updating the Guidelines, if deemed necessary, and/or pursuing next steps.

7 The co-sponsors welcome the proposal by the United States to change the title of output 1.16 to reflect the experience-building phase and to extend the target completion year to 2026, reflecting MEPC 80's approval to invite input on lessons learned and best practices through MEPC 85 (SDC 10/5/5, paragraph 12). The United States' proposal that the EBP be a standing agenda item at MEPC to promote greater access to knowledge and research on URN and to encourage wide participation in the information sharing stage for the revised Guidelines is also supported.

8 To ensure the knowledge, research, and information is submitted in a way that fosters collective learning and is appropriate to inform next steps, the co-sponsors propose that SDC 10 develop a recommended structure and a plan for the EBP that includes the relevant elements described in paragraph 6. This could be accomplished by adding this task to the terms of reference for the proposed Working Group on the Review of the Guidelines (SDC 10/5, paragraph 48).

### **Fostering increased integration of energy efficiency measures and URN reduction measures**

9 The Secretariat, in its report on the Outcomes of the Expert Workshop on the relationship between energy efficiency and underwater radiated noise from ships, summarized the key conclusions and takeaways reached at the workshop (SDC 10/INF.3, paragraphs 20 to 27). Chief among these takeaways was the acknowledgement that, given proven technologies and growing evidence of co-benefits, ship designs and operations that collectively increase energy efficiency, lower GHG emissions, and reduce URN must be prioritized now (SDC 10/INF.3, paragraph 20). It was also recognized that to accelerate progress toward decarbonization and ship quieting, intentional and integrated ship designs (and operations) that optimize energy efficiency (EE) and reduce GHG and URN are needed, as selections of energy efficiency measures without considering URN reduction may result in lost opportunities to cost-effectively reduce URN (SDC 10/INF.3, paragraph 21).

10 Several recent reports, including the report by Vard Marine Inc., commissioned by Canada and discussed at the Expert Workshop, have noted that in the majority of cases, EE/GHG and URN measures can be complementary, i.e., benefits will be realized in both areas. In most cases, meeting regulatory requirements for EE/GHG can be compatible with efforts to mitigate URN, especially if energy efficiency measures known to have significant URN reduction benefits, such as speed reduction and wind-assist technologies, are prioritized.

11 The co-sponsors note that the proposed action plan developed by the CG includes an overarching outcome related to sharing information and taking into consideration other IMO regulatory goals (SDC 10/5, annex 2). The Organization will be initiating a revision of its Carbon Intensity Indicator (CII) regulations at MEPC 82. Given the potential for significant URN reduction benefits to be realized through intentional selection of energy efficiency measures that deliver URN reduction, the co-sponsors propose that a new task be included in the proposed action plan directing SDC to submit an information document to MEPC 82 detailing the EE measures that provide URN benefits and those that offer no URN reduction benefits or have a negative effect on URN for consideration by MEPC in its revision of the CII.

### **Delineating a process for implementing the proposed action plan**

12 The co-sponsors support the proposal by the CG for a working group at SDC 10 to, *inter alia*, review and finalize the proposed action plan that addresses the barriers that were preventing the uptake and implementation of the 2014 Guidelines, and to submit the action plan to SDC 10 for approval at MEPC 81 (SDC 10/5, paragraph 48.4). The proposed action plan is responsive to MEPC's direction to the Sub-Committee to develop a proposal for a programme of action and/or next steps to further prevent and reduce URN based on the findings of the review of the Guidelines (MEPC 75/14, annex 3).

13 Each of the action plan's proposed outcomes and tasks are assigned a timeline (short, medium, long, continuous) and proposed priority ranking (low, medium, high) (SDC 10/5, paragraph 24). A majority of the plan's tasks are identified as short-term actions that should be undertaken immediately within the next three years and/or concurrently with the experience-building phase. Indeed, some of the tasks related to information sharing and awareness raising are essential for a successful experience-building phase of the Revised Guidelines. For this reason, the co-sponsors propose that SDC 10 discuss and agree upon a recommendation that identifies an appropriate process for implementing the action plan in a timely manner, and seek approval of the recommendation by MEPC 81 as a matter of urgency.

### **Supporting the inclusion of an Implementation Framework for the Guidelines for Underwater Radiated Noise Reduction in Inuit Nunaat and the Arctic**

14 The *Guidelines for Underwater Radiated Noise Reduction in Inuit Nunaat and the Arctic* (MEPC.1/Circ.907), is intended to provide additional information and guidance to operators transiting Inuit Nunaat and the Arctic. It is also intended to enable the engagement of Inuit and other Indigenous communities and make practical and effective use of Indigenous Knowledge in the review of the Guidelines for reducing underwater noise from commercial shipping to address adverse impacts on marine life.

15 To further support uptake and consideration of MEPC.1/Circ.907, the Inuit Circumpolar Council (ICC) has proposed that SDC include an "Arctic and Inuit Nunaat Implementation Framework" in the proposed action plan, with findings, insights, and experiences submitted on an ongoing basis to the experience-building phase (SDC 10/5/7, paragraph 8). The proposed Implementation Framework would create a "how to" protocol for shipowners and operators to increase understanding and uptake of the *Guidelines for Underwater Radiated Noise Reduction in Inuit Nunaat and the Arctic*.

16 The co-sponsors recognize the significant vulnerability of the Arctic marine environment, and the peoples who depend on this unique and relatively pristine environment, to underwater radiated noise, and the importance of facilitating and encouraging uptake of MEPC.1/Circ.907. Therefore, the co-sponsors support the proposal by the ICC.

### **Action requested of the Sub-Committee**

17 The Sub-Committee is invited to note the information, consider the proposals in paragraph 8, 11 and 13 and take action, as appropriate.

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