

58. Short term measures will only be of value if they can be agreed and implemented quickly, provide actual reductions in GHG emissions from international shipping and do not delay development of longer term measures.

59. This document has considered some short term measures which have been proposed:

- Speed Optimization and Speed Reduction
- Operational Efficiency Indicators
- Mandatory technology retrofit
- EEDI for existing ships built before EEDI Phase 0
- Strengthening EEDI requirements for existing ships which already have an attained EEDI value
- Require ships to measure speed-fuel curves in a standardized way.

The co-sponsors support speed optimization and improving the operational efficiency of existing ships. Both of these objectives could be achieved by strengthening the SEEMP. Mandatory speed reduction measures and mandating retro-active design measures and technology fitment would be time consuming to develop, incur a significant administrative burden and cost, distort markets and be of limited value. The co-sponsors have similar concerns regarding the use of operational efficiency indicators, although it is considered that these, or any suitable KPI, could be a valuable internal tool when demonstrating effectiveness of the SEEMP. Requiring an EEDI for existing ships would not affect operational efficiency since the EEDI is a design measure, and such a measure would be expensive and burdensome to implement and slow to take effect. Given the age profile of the world fleet, especially the larger ships which emit, this cannot be seen as an effective way forward. The co-sponsors can support requiring that new ships measure speed-fuel curves in a standardized way, however it is also considered that this information is already available for most existing ships, albeit not in a standardised form.

60. The co-sponsors consider that the efficiency of the existing fleet should be improved using operational measures, and that the most effective, least burdensome and quickest way to achieve this would be to strengthen the SEEMP. The co-sponsors support strengthening the EEDI for new ships but consider that any attempt to apply EEDI requirements retrospectively (including requiring EEDI reductions for ships which have an attained EEDI value) would be time consuming to agree and implement and that the cost of such a measure would be disproportionate with the expected benefits.

**Action requested by the Committee.**

61. The Committee is invited to consider the comments and proposals contained in this submission and to take action as appropriate.

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