

IUMI Policy Agenda

8. Plastic litter

Brief description

Over 300 million tons of plastic are produced every year for use in a wide variety of applications. At least 8 million tons of plastic end up in the oceans annually. Researchers estimate a plastic leakage into the ocean in 2040 of 29 million tons. Under the influence of UV radiation, wind, currents and other natural factors, plastic fragments into small particles, termed microplastics (particles smaller than 5 mm) or nanoplastics (particles smaller than 100 nm). Marine species ingest or are entangled by plastic debris which causes severe injuries and death. Plastic pollution threatens food safety and quality, human health, and coastal tourism.

The main sources of marine plastic are land-based. However, ocean-based plastic originates primarily from the fishing industry, nautical activities and aquaculture. In 2018, the IMO's Marine Environment Protection Committee (MEPC) adopted the IMO Action Plan to address marine plastic litter from ships. It aims to enhance existing regulations and introduce new supporting measures to reduce marine plastic litter from vessels. One aspect of the Action Plan is the consideration of a compulsory mechanism to declare the loss of containers at sea.

The contents of lost containers contribute to marine litter. The carriage of so-called "**nurdles**" (pre-production plastic pellets) is a particular concern. Nurdles are in widespread use and large quantities of containers of this commodity are being shipped. In May 2021, the MV X-Press Pearl spilt 11,000 tonnes of plastic pellets off the shore of Colombo, Sri Lanka. If nurdles are lost overboard, the consequences to the environment are significant as they float and can be widely distributed. Marine wildlife often mistake nurdles for food, causing injury and entering the food chain.

In April 2022, the IMO Sub-Committee on Pollution Prevention and Response (PPR) supported the need for measures reducing the environmental risk of marine transport of microplastic particles and synthetic resin pellets. Concrete proposals included amendments to MARPOL 73/78 Annex III and classification according to section 2.9.3 of the IMDG Code "Environmentally hazardous substances (aquatic environment)" to strengthen stowage requirements for containers containing plastic pellets, and to develop guidance for handling pellets.

During PPR 11 held from 19 to 23 February 2024, the Sub-Committee agreed on recommendations for the carriage of plastic pellets by sea in freight containers. These recommendations emphasize the use of robust packaging to prevent leakage, clear

identification of containers carrying plastic pellets, and appropriate stowage under deck or in sheltered areas to minimize environmental hazards. Additionally, the Sub-Committee developed guidelines for the clean-up of plastic pellets from ship-source spills, providing practical guidance for government authorities to ensure effective response actions. These guidelines cover contingency planning, response, post-spill monitoring, analysis, and cost recovery.

In October 2024, during MEPC 82, the Committee agreed to include the development of mandatory measures to prevent losses from the maritime transport of plastic pellets in the IMO Action Plan to address marine plastic litter from ships. The Committee instructed the PPR Sub-Committee to analyse potential mandatory instruments and their implications, with the aim of developing a regulatory framework to effectively reduce environmental risks associated with plastic pellet transport.

In summary, the IMO has advanced both non-binding recommendations and initiated steps toward developing mandatory measures to mitigate the environmental risks of plastic pellet transport by sea. The PPR 12 session in January 2025 is expected to further these efforts, with proposals from the European Commission and other stakeholders contributing to the development of binding regulations.

All proposals align with the objective of establishing binding regulations as also pursued by IUMI. However, the approaches result in different allocation of responsibilities: one on the cargo interests, while the other focuses on the ship. As a result, IUMI does not explicitly favour either proposal.

The PPR Correspondence Group was also instructed to further progress work on reporting mechanisms for lost fishing gear. PPR was further instructed by the MEPC in July 2023 to consider a proposal for requiring a ship-specific plan for the on-board management of fishing gear.

Relevant authority / organizations and documents:

- **International Maritime Organization (IMO), MEPC and PPR:**
(www.imo.org/en/OurWork/Environment/Pages/Default.aspx#have)
 - **Resolution MEPC.310(73):** Action Plan to address marine plastic litter from ships (MEPC73/19 - Annex 10), adopted 26 October 2018.
 - **MEPC75/8/3:** Report of the Correspondence Group on development of a strategy to address marine plastic litter from ships, 27 December 2019.
 - **MEPC77/8/3:** Follow-up work emanating from the action plan to address marine plastic litter from ships, submitted by Sri Lanka, 1 October 2021.
 - **PPR10/13:** Report of the Correspondence Group on marine plastic litter from ships, 20 January 2023.
 - **PPR10/INF.13:** Guidelines on clean-up of plastic pellets from ship-source spills, submitted by Norway, South Africa, ITOPF and IG, 17 February 2023.



MEPC.1/Circ.909 Recommendations for the carriage of plastic pellets by sea in freight containers

Timeline / important dates:

- Action plan to address plastic litter from ships adopted by IMO, October 2018
- Ongoing work in MEPC and PPR (Sub-)Committees

IUMI will:

- Participate in IMO Working Groups and Correspondence Groups to communicate marine insurers' positions regarding safe packaging of plastic pellets.
- Supports mandatory requirements for the safe carriage of plastic pellets in containers.