

## IUMI Policy Agenda

### 10. Plastic litter

#### *Brief description*

Over 300 million tons of plastic are produced every year, with at least 8 million tons of plastic ending up in the oceans annually. Researchers estimate a plastic leakage into the oceans in 2040 of 29 million tons. Under 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), which harm marine life, food safety and quality, human health, and coastal economies.

The main sources of marine plastic are land-based, but the fishing industry, nautical activities and aquaculture also play a role. In 2018, the IMO's Marine Environment Protection Committee (MEPC) adopted the IMO Action Plan on marine plastic litter from ships including reporting on loss of containers and the safe carriage of plastic pellets.

Incidents such as the X-Press Pearl spill in 2021 and other casualties have shown the severe consequences of pellets losses at sea. For insurers this poses risk across all major lines: H&M underwriters face risks from fire and contamination, P&I clubs are confronted with massive clean-up and liability claims, and cargo insurers cover degraded or contaminated plastics. IUMI has therefore participated in discussions at the IMO, stressing the need for binding measures, clear responsibilities and stronger preventive standards to reduce both environmental and financial risks.

Since 2022, the IMO has advanced proposals to classify plastic pellets as environmentally hazardous substances under the IMDG Code, to amend MARPOL Annex II, and to strengthen stowage requirements. At PPR 11 (February 2024), recommendations were agreed on packaging, clear identification of containers and appropriate stowage under deck or in sheltered areas, along with guidelines for the clean-up of plastic pellets for ship-source spills. These guidelines cover contingency planning, response, post-spill monitoring, analysis, and cost recovery.

At MEPC 82 in October 2024, the Committee instructed the PPR Sub-Committee to analyse potential mandatory instruments and their implications, with the aim of developing a regulatory framework. Building on this mandate, PPR 12 in January 2025 finalized the 2025 Action Plan to Address Marine Plastic Litter from Ships, endorsed draft recommendations for mandatory pellet carriage requirements, and agreed on guidelines for spill response. These outputs were considered by MEPC 83 in April 2025. All proposals align with the objective of establishing binding regulations, as pursued by IUMI. However, the approaches differ in their allocation of responsibilities, with one focusing on cargo

interests and the other on the ship. IUMI therefore does not explicitly favour either proposal.

PPR 12 also advanced work on reporting mechanisms for lost fishing gear and on the development of ship-specific plans for its on-board management. The results were likewise discussed at MEPC 83 as part of the broader effort to strengthen the IMO Action Plan.

PPR 13 in February 2026 advanced the discussion by identifying legal pathways for binding measures and recommending the development of a mandatory code for the transport of plastic pellets under MARPOL Annex III and or SOLAS, for consideration by MEPC 84. In parallel, MSC 111 is expected to examine the safety dimension under SOLAS, including whether existing instruments are sufficient and how requirements on packaging, stowage, container securing and operational handling of pellets should be addressed, as well as how these elements can be aligned with the environmental framework under MARPOL.

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#### *Relevant authority / organizations and documents:*

- **International Maritime Organization (IMO), MEPC and PPR:**  
([www.imo.org/en/OurWork/Environment/Pages/Default.aspx#have](http://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, ITOPI 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.
- Support mandatory requirements for the safe carriage of plastic pellets in containers.