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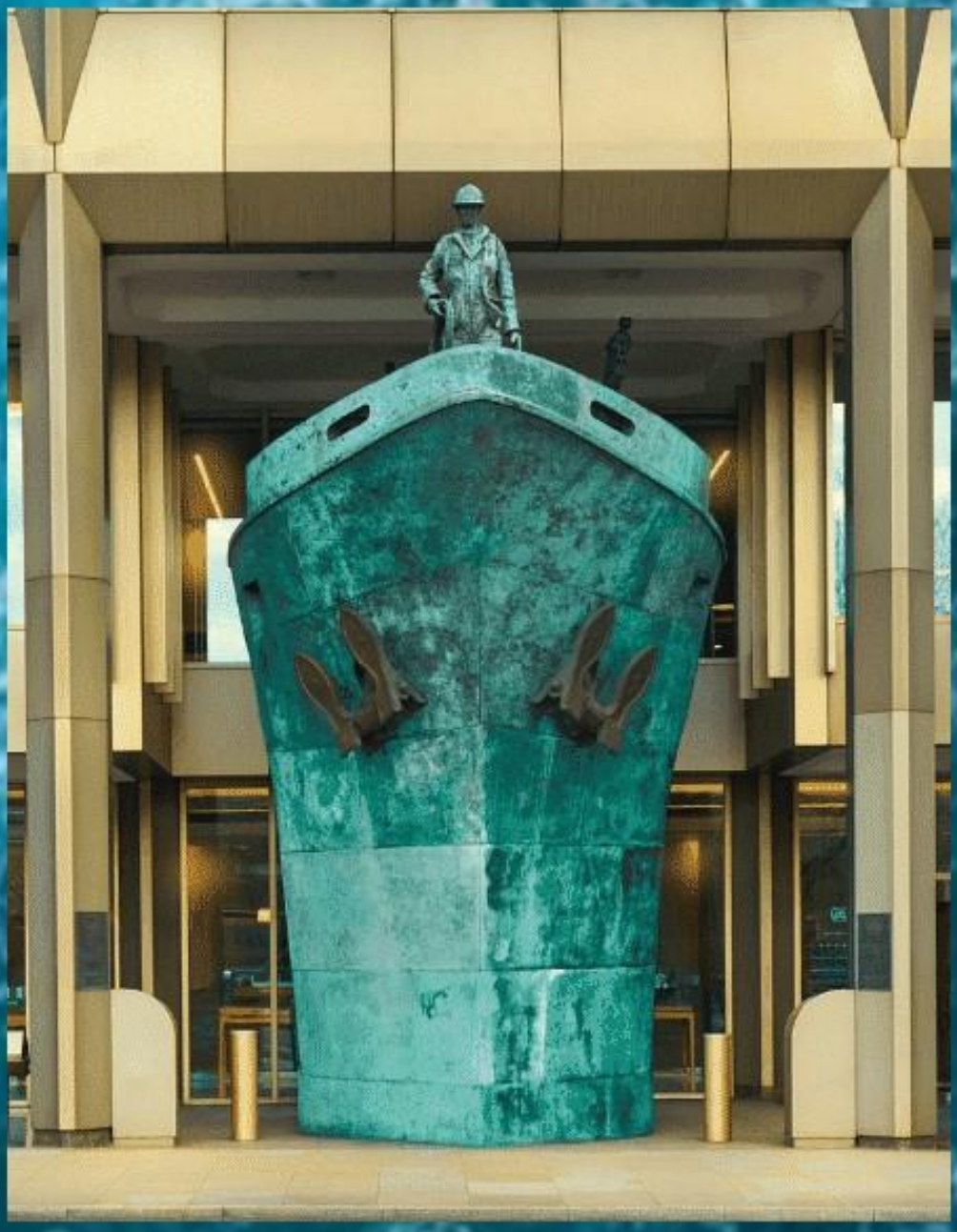

Embassy of Italy in London

Permanent Representation to the International Maritime Organization, the IOPC FUNDS and the IMSO

Annual Report 2024

Permanent Representation to the International Maritime Organization (IMO), the International Oil Pollution Compensation (IOPC) Funds and the International Mobile Satellite Organization (IMSO)

First Annual Report

2024

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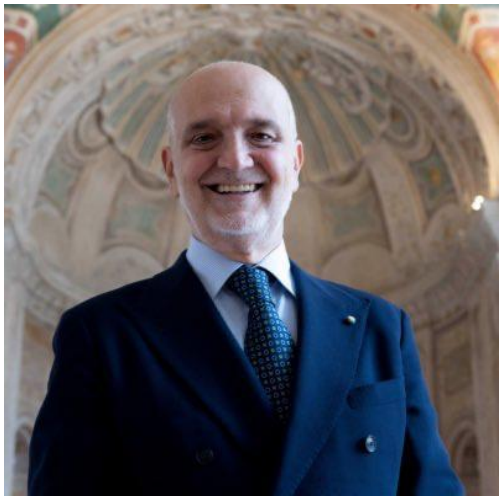
Preface by the Italian Permanent Representative to the IMO, IOPC Funds and IMSO



It is with great satisfaction that I present the first Annual Report of the Permanent Representation of Italy to the International Maritime Organization (IMO), the International Oil Pollution Compensation Funds (IOPC Funds) and the International Maritime Satellite Services Organization (IMSO). This report reflects the intensive work, steady contribution, and achievements of the Italian delegation during this year. The year 2024 represented a year of consolidation and growth for our Permanent Representation. We have intensified our presence in the three international organizations, strengthening Italy's strategic role in the global maritime sector.

Our country, an IMO Council member in Category A, continues to confirm its leadership position as one of the leading maritime nations, representing not only the interest of the Italian shipping industry, but also that of a sector that is of crucial importance to our economy and international trade.

The IMO, the main international forum for the regulation of maritime safety, environmental protection and energy efficiency, saw an active and constant participation of our delegation. During the year, Italy took part in all the meetings of the Council and in the main technical Committees, including the Maritime Safety Committee (MSC), where Italy supported initiatives to improve the safety of ships and the protection of seafarers, proposing more advanced standards to address the new challenges related to technological innovation and digitalization. In the Marine Environment Protection Committee (MEPC), Italy promoted policies for the decarbonization of the maritime sector, contributing significantly to the negotiations to reach the global objectives of reducing greenhouse gas emissions. In the Legal Committee (LEG), we defended the harmonization of regulations to protect victims of maritime accidents and the environment, with particular attention to the liability of shipowners. Finally, during the work of the Facilitation Committee (FAL), Italy provided its contribution on the implementation of the Maritime Single Windows.

Thanks to our constant presence and the technical contribution of Italian experts, Italy confirmed its position as a reliable interlocutor and a guide for the most complex and innovative issues in the international maritime panorama.

In the context of the IOPC Funds, Italy continued to promote effective management of the financial resources earmarked for compensation for damages resulting from oil pollution incidents. Our Representation participated in all the sessions of the Funds, actively contributing to the definition of compensation policies. A particular focus was placed on improving accident prevention mechanisms, underlining the importance of an integrated approach between technical regulations, financial responsibility and international collaboration.

The IMSO, which supervises maritime satellite communication services, benefited from the Italian contribution in numerous initiatives aimed at improving the safety of communications at sea and the efficiency of search and rescue operations.

The Italian delegation supported the strengthening of satellite technologies to ensure higher safety standards, also in view of the challenges related to the growing automation of the maritime sector.

The maritime sector represents a cornerstone for the Italian economy and for our geopolitical role in the Mediterranean and beyond. With one of the largest and most modern merchant fleets in the world, our country has a crucial responsibility in ensuring compliance with international regulations, environmental protection and the well-being of maritime workers. The Italian Representation has been able to translate these priorities into concrete actions within international organizations, acting as a spokesperson for national interests and promoting policies that reflect the needs of the sector.

A particularly significant result for 2024 was the establishment of the Maritime Office of the Italian Embassy, which I strongly supported and which was headed by a maritime expert appointed by the MAECI. This office, established to respond to the growing needs of the Italian maritime sector, has worked closely with the Permanent Representative, providing technical and administrative support to the activities carried out at IMO, IOPC Funds and IMSO.

Thanks to this strengthening, we have been able to ensure greater efficiency in participating in international activities and enhance coordination between national institutions and international organizations.

The results obtained in 2024 demonstrate the ability of our Representation to act as a spokesperson for Italian interests with competence and determination.

This first Annual Report bears witness to the excellence of the work carried out and represents a solid basis for facing future challenges. We confirm our commitment to continue along this path, ensuring a constant and qualified presence in all international venues, promoting innovative and sustainable solutions for the maritime sector and strengthening Italy's role as a global leader in the maritime world.

Amb. Inigo Lambertini

Italy's contribution to the International Maritime Organization (IMO)

CHAPTER I

The Role of the Italian Permanent Representation to the IMO

SUMMARY: 1. ABOUT THE IMO. – 1.1 THE IMO CONVENTION – 1.2 A FOCUS ON SAFETY – 1.3 PROTECTION OF THE MARINE ENVIRONMENT – 1.4 SATELLITE-BASED SAFETY AND RESCUE COMMUNICATIONS – 1.5 SAFETY MANAGEMENT AND TRAINING – 1.6 MARITIME SECURITY – 1.7 CAPACITY BUILDING – 1.8 ADDRESSING THE CLIMATE CRISIS - 2. ITALY'S ROLE IN THE COUNCIL. 2.1 132ND SESSION OF THE COUNCIL – 2.2 133RD SESSION OF THE COUNCIL– 3. HOT TOPICS IN IMO - 4. STRENGTHENING ITALY'S PRESENCE IN IMO'S WORK. 4.1 IN THE PAST – 4.2 THE MARITIME OFFICE

1. About the IMO.

The International Maritime Organization (IMO) is a specialist agency of the United Nations, established following the adoption of the Geneva International Maritime Convention of 1948, aimed at promoting maritime cooperation between member states and ensuring safety of navigation and protection of the marine environment. It has 176 member states and is headquartered in London..

1.1 The IMO Convention

Since the mid-19th century, numerous treaties relating to the sea have been adopted. Several countries have proposed establishing a permanent international body to promote maritime safety more effectively. In 1948, the United Nations Maritime Conference held in Geneva adopted the Convention formally establishing the Inter-Governmental Maritime Consultative Organization (IMCO), which became the International Maritime Organization (IMO) in 1982.
The IMCO Convention entered into force in 1958, and the new organization met for the first time the following year.
The purposes of the Organization, as summarized in Article 1(a) of the Convention, are "To provide machinery for co-operation among Governments in the field of governmental regulation and practices relating to technical matters of all kinds affecting shipping engaged in international trade, and to encourage the general adoption of the highest practicable standards in matters concerning maritime safety, efficiency of navigation and prevention and control of marine pollution from ships". The Organization is also authorized to deal with administrative and legal matters relating to these purposes.

1.2 A focus on safety

Among the IMO's early initiatives was the adoption in 1960 of the fourth version of the International Convention for the Safety of Life at Sea (SOLAS), followed by the 1974 Convention, which includes

the tacit acceptance procedure (an amendment enters into force on a specified date unless objections to the amendment are received before that date from an agreed number of Parties). The 1974 Convention has been updated and amended on numerous occasions.

The primary objective of the SOLAS Convention is to specify minimum standards for the construction, equipment and operation of ships, consistent with their safety.

1.3 Protection of the marine environment

The increase in the quantity of oil transported by sea and the size of tankers was of particular concern, and the Torrey Canyon disaster of 1967, in which 120,000 tons of oil was spilled, demonstrated the scale of the problem.
In subsequent years, the IMO introduced a series of measures to prevent tanker accidents and to minimize their consequences.
The most important of these measures was the International Convention for the Prevention of Pollution from Ships, 1973, as amended by the 1978 Protocol (MARPOL 73/78). This Convention covers not only accidental and operational pollution by oil, but also pollution by chemicals, packaged goods, sewage, waste and air pollution.
The IMO was also given the task of establishing a system to provide compensation to those who had suffered financial loss as a result of pollution. This led to the signing of three agreements. The "International Convention on Civil Liability for Oil Pollution Damage" (CLC) was signed in Brussels in 1969. The "International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage" (FUND Convention) of 1971 focused on the civil liability regime for damage caused to the marine and coastal environment by the spillage of hydrocarbons considered as transported cargo. Finally, the "International Convention on Liability for Bunker Oil Pollution Damage" (Bunker Oil), signed in London on 23 March 2001, was on the civil liability regime for damage caused by a potential loss, spillage or escape of fuel from ships.

1.4 Satellite-based safety and rescue communications

Also in the 1970s, a global search and rescue system was launched with the establishment of the International Mobile Satellite Organization (IMSO), which greatly improved the transmission of radio and other messages to ships. The Global Maritime Distress and Safety System (GMDSS) was adopted in 1988 and began to be gradually introduced from 1992. In February 1999, the GMDSS became fully operational, so that now a ship in distress anywhere in the world can receive assistance even if the ship's crew does not have time to radio for help, as the message is transmitted automatically. Under the Convention for the Safety of Life at Sea (SOLAS), cargo ships of 300 gross tonnage and above and all passenger ships on international voyages must be equipped with satellite and radio equipment that meets international standards. In maritime areas not covered by terrestrial radiocommunications systems, the GMDSS relies primarily on satellite communications to enable mariners to send distress alerts and receive safety information such as navigational warnings and weather forecasts.

1.5 Safety Management and Training

Two initiatives of the 1990s are particularly important insofar as they address the human element of shipping. On 1 July 1998, the International Safety Management Code came into force, becoming applicable to passenger ships, oil and chemical tankers, bulk carriers, gas carriers and high-speed

cargo craft of 500 gross tonnage and over. It became applicable to other cargo ships and mobile offshore drilling units of 500 gross tonnage and over from 1 July 2002.
On 1 February 1997, the 1995 amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978, came into force. These amendments have significantly improved the standards of seafarers. A major revision of the STCW Convention and Code was completed in 2010 with the adoption of the "Manila Amendments to the STCW Convention and Code".

1.6 Maritime Security.

In the 2000s, following the terrorist attacks on the Twin Towers in New York, attention to security became a global priority. In particular, in July 2004, a new system of measures for maritime security to protect international navigation came into force, which included the International Code for the Security of Ships and Port Facilities (ISPS Code). This code became mandatory thanks to the amendments to the SOLAS Convention adopted in 2002.

In 2005, the IMO also adopted amendments to the Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation (SUA Convention), signed in Rome on 10 March 1988 together with the Protocol for the Suppression of Unlawful Acts against the Safety of Fixed Platforms located on the Continental Shelf.

1.7 Capacity building

The IMO Member state Audit Scheme, which became mandatory under a number of IMO primary instruments on 1 January 2016, is increasingly playing a key role in supporting implementation by providing the Member state being audited with a comprehensive and objective assessment of how effectively it administers and implements the mandatory IMO instruments covered by the scheme.

1.8 Addressing the climate crisis

An increasingly urgent challenge is to address harmful greenhouse gas (GHG) emissions from maritime shipping. As a member of the United Nations, the IMO is committed to supporting the sustainable development goal defined by the UN families: take urgent action to combat climate change and its impacts, in line with the 2015 Paris Agreement to reduce greenhouse gas emissions that cause global warming.
The first set of international mandatory measures to improve the energy efficiency of ships was adopted in 2011. Since then, the IMO has adopted further measures such as the initial GHG strategy in 2018 and, in 2023, the revised strategy on the reduction of GHG emissions from ships. The latter strategy through a just and equitable transition aims to gradually reduce GHG emissions from maritime shipping and eliminate them entirely by 2050.

2. Italy's role in the Council.

Italy has been a member of the IMO Council in Category A continuously since the establishment of the IMO. During the thirty-third session of the IMO Assembly held from 27 November to 6 December

2023, Italy, together with Greece and Japan, was the country that obtained the highest number of votes among the members of the Council (146 out of 162 valid votes).
Category A of the IMO Executive Board includes states that, by virtue of the importance of their merchant fleets, provide a significant contribution to the development of global maritime transport. Being included in this category is a recognition of the strategic importance of the Italian maritime sector and of the leading role that Italy plays at an international level in promoting the safety and sustainability of navigation.
Its Category A membership gives Italy a leading role in decisions that affect the future of maritime transport at a global level. This means that our country has a direct influence on the development of international regulations on maritime safety, protection of the marine environment and facilitation of international maritime transport.

2.1 132nd session of the IMO Council

During the 132nd session of the IMO Council, with particular regard to the crises in the Red Sea and Black Sea areas, the Italian delegation aligned itself with the position of the European Union condemning the illegal and unjustified actions that threaten the safety of international maritime transport in these areas while generating both the increase in energy and food prices and phenomena such as the so-called "shadow fleets". Furthermore, the Italian delegation with regard to the Red Sea crisis, underlined Italy's front-line commitment with its participation from the beginning in the European defensive operation EUNAVFOR ASPIDES through air and naval assets of the Navy, with the aim of restoring maritime safety and freedom of navigation in a strategic maritime corridor, as well as protecting seafarers and safeguarding freedom of navigation. These positions were reiterated during each IMO Committee and Sub-Committee during 2024.
During the work of this session, held in July 2024, a series of proposals aimed at modernizing the Organization's operating procedures and making them more effective were analyzed in detail. Among the key points discussed was the revision of the Rules of Procedure (RoPs) to include definitive rules on hybrid meetings, which have gained increasing importance in recent years. These rules aim to ensure that such meetings are more flexible and inclusive, taking into account the experience gained during the use of virtual and hybrid formats.
Another important issue addressed during this session was the digitalization of the maritime sector. In particular, it was proposed to formally adopt policies promoting the exclusive use of digital documents during the work and simplified access to such materials for delegates and stakeholders, with the aim of increasing efficiency and reducing the environmental impact of the IMO's activities.
Furthermore, proposals were discussed to increase the transparency of the Organization, in line with international best practices. Suggestions included the publication of documents and decisions of the IMO bodies, as well as the introduction of live streaming mechanisms for public meetings. These initiatives were welcomed, as they are believed to strengthen trust in the work of the IMO and promote greater participation among stakeholders.
Another topic of great importance was the implementation of the strategic framework for multilingualism, considered a priority to ensure the universality and accessibility of the activities of the IMO. In particular, significant progress was made in the revision of the consolidated versions of the IMO Convention in the six official languages of the Organization. The updated versions in English, French and Spanish were definitively approved, while it was decided that the Arabic, Chinese and Russian versions will become official consolidated texts in conjunction with the entry into force of the 2021 amendments to the IMO Convention.

The Italian delegation reiterated its support for the Strategic Framework for Multilingualism, recognizing its importance as a tool to improve the efficiency of communications and to promote inclusiveness among Member states. In this perspective, the future development of administrative and operational guidelines was welcomed, which will have the task of providing clear and practical direction for the implementation of multilingual policies in the different operational areas of IMO.

2.2 133rd session of the IMO Council

During the 133rd session of the IMO Council, held in November 2024, significant changes to the Rules of Procedure (RoPs) were considered and approved to adapt them to the needs of hybrid meetings. Discussions covered aspects such as the use of electronic copies of credentials, to be issued in advance of paper versions, live streaming of meetings and the introduction of rules for remote voting. The Italian delegation co-sponsored a document aimed at supporting hybrid meetings and the adoption of remote voting for overt decisions. However, Italy expressed strong concerns regarding the secret ballot and the proposal for proxy voting. Both mechanisms were assessed as potentially detrimental to the fundamental principle of "one member, one vote". In particular, the Italian delegation highlighted the risks of this practice, which could compromise the transparency and accountability of decisions, especially in the context of the representative structure of the IMO Council. Furthermore, connectivity and cybersecurity issues were highlighted, which could make the process unreliable.
The Italian position found broad consensus among the members of the Council, and consequently proxy voting was not approved. The relevant working group therefore decided not to include this mode of voting in the new procedural rules, reiterating the centrality of collegial decisions expressed according to the traditional principles of the IMO.
Significant progress was also made in the field of multilingualism. During the Council, the results of a six-month trial period were analyzed, during which the IMO Secretariat experimented with increasing the translation of documents into all six official languages of the IMO. The Italian delegation, as it had already done in the 132nd session, supported this initiative, recognizing the importance of multilingualism to ensure inclusiveness and participation. However, it expressed concerns about the economic impact of certain proposals, such as officially extending the number of working languages of the Organization to six.
This proposal, put forward by a member state, was examined in the context of current translation policies, which provide for the management of working papers in only three working languages. Italy highlighted that an extension of the working languages would entail significant costs, with potential repercussions on the IMO budget and on member states, especially developing countries, which could find it difficult to sustain a possible increase in contribution rates. Such additional costs could also limit the funds allocated to development and technical assistance projects, compromising the strategic priorities of the IMO, such as the protection of seafarers, support to developing countries and the sustainable management of maritime areas affected by conflict. The Italian delegation also highlighted the growing role of digital translation technologies, which are increasingly sophisticated, affordable and accessible. The use of these tools could allow for a quick and accurate understanding of technical texts without further burdening the IMO budget, avoiding multiplying the costs of translating documents into multiple languages through traditional manual methods. In a context of limited resources, the Italian representation called for considering this technological solution as an opportunity to reconcile the goal of multilingualism with the financial sustainability of the Organization.

Among other noteworthy decisions, the Council welcomed the introduction of the new Contribution Incentive Scheme (CIS), a mechanism designed to incentivize member states to pay their contribution quotas in a timely manner by offering rewards in the form of interest earnings.
In addition, the request to establish a cooperation agreement between the IMO and the new Intergovernmental Maritime Signaling Organization (formerly IALA), which will hold its first Assembly in its new institutional capacity in January 2025, was approved.
Finally, the Council gave further impetus to work on the modernization and enhancement of the IMO database platform "GISIS". This platform represents an essential tool for sharing information and technical data between Member states, and its update aims to improve accessibility and efficiency in the management of global maritime information.

3. Hot topics in the IMO

- Decarbonization: The IMO, and in particular the MEPC, is finalizing the measures through which to achieve the objectives indicated in the strategy on the reduction of greenhouse gases produced by ships. The objective is to achieve net zero by 2050. The Italian Permanent Representation is overseeing the work, with the support of the MASE and the Marine Environmental Department of the Coast Guard. Given the impact of these decisions on a maritime economy that is crucial to the country's economic and commercial system, this requires a collective effort, including the participation of stakeholders and national experts in the sectors.
- Autonomous ships and alternative fuels: The IMO is responsible, among other things, for developing a regulatory framework on maritime safety. This also covers "autonomous" ships, known as MASS (Maritime Autonomous Surface Ships). The process involves carrying out a comprehensive review of existing legislation and drawing up new standards in communications and cybersecurity, aspects that are particularly important in light of the digitalization that increasingly characterizes maritime transport. The gradual transition to alternative fuels (methanol, hydrogen, ammonia) also involves major technical adjustments and standards for navigation safety, in order to mitigate the risks of these new emission-reduction measures. The work also includes the development of new models and the implementation of conventions relating to crew training. The Italian delegation has been among the most active in implementing the IMO strategy on decarbonization and new alternative fuels.
- Maritime security: recent geopolitical scenarios, which have had a significant impact on the maritime sector, have pushed the Organization to rapidly develop operational tools and to promote information exchange among member states. The IMO has invested in capacity-building activities in this area. The important role played by our country – illustrated by the commitment of military vessels in high-risk areas and by the Coast Guard Corps' work within the Interministerial Committee for the Safety of Maritime Transport and Ports (CISM), as the designated authority for security – as well as the presentations in plenaries, have increased Italy's visibility within the IMO.
- Inclusivity and gender equality in the maritime sector are among the priorities of the current IMO policy. Major changes have been made within the top positions of the Organization to ensure respect for gender equality and participation in decision-making roles that is takes more account of inclusion and rural countries. The Italian Representation has consistently supported such initiatives.

4. 4. Strengthening Italy's presence in the IMO's work.

4.1 In the past

The Permanent Representation of Italy to the (IMO), established in 2010, has played a fundamental role in supporting the Embassy in activities related to international maritime issues. Historically made up of personnel from the Coast Guard Corps, this representation has evolved in response to the growing role of the IMO and Italy within the Council's Category A. This development has required an in-depth assessment of the human resources necessary to ensure effective and authoritative participation in the Organization's decision-making processes. Over the years, the Italian Representation has established itself as a fundamental resource for maintaining an active and proactive role in the international maritime landscape. The head of the Italian delegation oversees all the IMO's work relating to the safety and security of navigation, the protection of the marine environment from pollution and the fight against piracy, and also oversees the work of the International Oil Pollution Compensation (IOPC) Funds, relating to compensation for damages arising from maritime disasters, and the International Mobile Satellite Organization (IMSO), responsible for maritime satellite communications at a global level.
The Representation has recently taken on even greater importance, becoming a strategic operational resource to ensure continuous connection with the IMO and the other delegations of the member states. In particular, the Representation has promoted numerous initiatives of international importance, including:

- the publication and circulation of urgent national provisions;
- the timely updating of health provisions regarding the circulation of seafarers and crew changes.
- the management and dissemination of the new guidelines on MARPOL certifications.

This commitment has ensured that Italian provisions are integrated into the global framework of IMO policies, thus contributing to the protection of national interests and the maintenance of international maritime operations.
The above was also made possible thanks to close collaboration between the Italian Ministry of Foreign Affairs and the MIT through the creation of the position of a maritime expert at the Embassy. This figure, who is currently head of the Maritime Office and deputy representative at the IMO, IOPC FUNDS and IMSO, is responsible for ensuring a regular, qualified and structured participation in the main decision-making bodies while supporting the Permanent Representative in his delicate work.

4.2 The Maritime Office

Italy's re-election to Category A of the Council of the IMO is an important milestone, which entails new and greater responsibilities for our country. This role implies a constant and proactive commitment to defending national political, economic and commercial interests in strategic sectors such as maritime decarbonization and the creation of global standards for navigation and shipping safety. In these areas are the Italian merchant navy is particularly competitive and Italy is a leader in the international maritime sector.

The Maritime Office was established at the Embassy of Italy in order manage IMO activities more effectively and address maritime safety, environmental sustainability and the economic development of maritime communities with greater resilience and proactivity.

In addition to participating in the work of the IMO, the International Oil Pollution Compensation (IOPC) Funds and the International Mobile Satellite Organization (IMSO), the Maritime Office performs the following tasks:

- coordinates Italian delegations to the aforementioned international bodies, with the aim of maximizing Italy's participation in decision-making processes and contributing to the development of policies in the international maritime sector;
- contributes to the creation of international standards on maritime safety, environmental protection and the regulation of new technologies applied to navigation;
- organizes events and moments of reflection dedicated to emerging challenges for the global maritime sector;
- works with industry experts, institutions and stakeholders to examine important issues, such as sustainability, digitalization and maritime safety;
- promotes a constructive dialogue between the public and private sectors, promoting innovative and shared solutions;
- provides technical and operational support to the Consulates General of Italy in London and Edinburgh, and to the Consulate of Italy in Manchester, for matters related to the maritime sector, including assisting Italian seafarers with issues of safety, certification and international regulations; managing technical documentation and certificates in compliance with international standards; and promoting the interests of the Italian maritime sector in the United Kingdom.

In view of the next General Assembly, the Maritime Office is preparing an Aide Memoire, a strategic document that will highlight Italy's contribution to the IMO, promoting our candidacy in Category A of the IMO Council for 2026-2027, with a focus on diplomatic activity aimed at this reconfirmation.

Among the most significant initiatives, the Maritime Office has started publishing annual reports, starting with this document, which will provide a detailed overview of the activity carried out, the results achieved and future objectives. This tool will represent a tangible testimony of Italy's commitment and will ensure transparency with respect to institutions, citizens and operators in the sector.

The creation of the Maritime Office significantly strengthens the Permanent Representation of Italy to the IMO, the IOPC Funds and the IMSO and at the same time ensures more effective protection of Italy’s interests in the decision-making processes of these bodies.

Italy's contribution to the decarbonization and simplification processes of maritime transport

CHAPTER II

Activity in IMO Committees and Sub-Committees.

SUMMARY: 1. ITALY'S CONTRIBUTION TO THE MARINE ENVIRONMENTAL PROTECTION COMMITTEE (MEPC 82). – 2. DEEP DIVE: DECARBONIZATION IN THE MARITIME SECTOR. – 3. DEEP DIVE: EMISSION TRADING SYSTEM (ETS) IN THE MARITIME SECTOR - 4. ITALY'S ROLE IN THE MARITIME SAFETY COMMITTEE. – 5. THE SIMPLIFICATION PROCESS IN THE MARITIME SECTOR CARRIED OUT BY THE FAL COMMITTEE. – 6. DEEP DIVE: THE STATE OF THE ART OF THE MARITIME SINGLE WINDOW. – 7. TECHNICAL COOPERATION. - 8. LEGAL ASPECTS ADDRESSED IN THE CONTEXT OF THE LEGAL COMMITTEE.

1. Italy's contribution to the Marine Environmental Protection Committee (MEPC 82)

The Italian delegation plays an active role in the work of the Marine Environmental Protection Committee (MEPC). During 2023, one of the main topics discussed, in both plenary sessions and working groups, was the reduction of greenhouse gas (GHG) emissions. The discussion focused in particular on the economic implications of introducing a financial compensation regime, which would entail ships' making payments (levies) to the IMO. This mechanism has raised concerns, especially due to the risk of trade distortions and potential reflagging.
With regard to the positions supported, member states were divided according to blocs. In particular:

- African, South American and developing countries (Least Developed Countries [LDCs]) expressed strong concerns about the impact of the levies on food security and basic necessities, of which they are the main producers. They called for a review of the Comprehensive Impact Assessment (CIA) [1] of the Steering Group Committee of Member states, stressing that an increase in shipping costs could increase the price of essential goods;
- Small Island Developing States (SIDS) expressed concerns about climate change and the consequences on their response to natural disasters, taking into account their geographic vulnerability. They also called for the matter to be reassessed;
- China and India: raised reservations about the method adopted for the CIA, complaining about the lack of unanimity in its approval;
- Brazil: called for further scientific studies to support future decisions.

Italy, together with the bloc of western states, was in favor of the Comprehensive Impact Assessment, calling it a complete, independent and scientifically based work. However, it was open to further in-depth studies, in particular on the issues of food security and disaster response, as long as they respect the deadlines for achieving the objectives. In 2024, the Italian delegation played a key role in the

[1] The *Comprehensive Impact Assessment* (CIA) is a process that evaluates the potential impact and risk of a policy or process. It concentrates on environmental and social aspects and looks at current, planned and future development projects as well as other stress factors.

working group, fostering cohesion among the Mediterranean EU countries to define a unified position that ensures fair distribution of proceeds, with particular attention to SIDS and LDCs.
For the 83rd MEPC session, scheduled for 2025, substantial progress is expected in drawing up medium-term technical and economic measures for the reduction of emissions.
A topic closely linked to the reduction of emissions was the energy efficiency of ships. The Committee discussed the introduction of the Energy Efficiency Existing Ship Index (EEXI) and the revision of the Carbon Intensity Indicator (CII), differentiating it based on the types of ships.
With regard to Underwater Radiated Noise, i.e. the underwater noise produced by ships, the guidelines were approved during the 82nd MEPC session. In this regard, Italy contributed with research conducted by the University of Genoa as part of the LIFE-PIAQUO project, highlighting the link between noise reduction and improved energy efficiency.
Regarding "polar fuels" (fuels that can be used in polar areas), Italy supported the need for standards defined by ISO and participated in the debate at the 12th session of the Sub-Committee on Pollution Prevention and Response (PPR). Alternative fuels with low or zero GHG impact, such as hydrogen, DMA[2] and DMZ[3], were analyzed, contributing to the in-depth analysis of their potential uses and problems.
Regarding the issue of potential inconsistencies between the Basel Convention (on transboundary traffic of waste, including ships for recycling) already implemented by EU Regulation no. 1257/2013 and the Hong Kong Convention (on ship recycling), not yet ratified by Italy, MEPC 82 provisionally approved the interpretative guidelines developed by the IMO Secretariat, sending them to the Secretariat of the Basel Convention for further assessment.
Finally, Italy reaffirmed the effectiveness of Particularly Sensitive Sea Areas (PSSA) as a tool to protect marine ecosystems without hindering maritime activities. In particular, the success of PSSA as a tool that contributes to environmental protection and sustainable development of maritime areas was highlighted[4].
These issues reflect Italy's commitment to actively contributing to the work of the MEPC, promoting a balance between environmental protection and economic development of the maritime sector.

2. Deep dive: decarbonization in the maritime sector[5]

The international shipping sector is responsible for approximately 2.9% of global emissions caused by human activities. The International Maritime Organization began to address the problem of air pollution from ships at the end of the last century. With Resolution A.719(17), entitled Prevention of Air Pollution From Ships, adopted on 6 November 1991, the organization specified: "*The urgent necessity of establishment of a policy on prevention of air pollution from ships, and development of reduction objectives and measures to achieve the objectives for control of emissions of all the elements of air pollution including ozone-depleting CFCs and halons, exhaust gases resulting from harmful fuel components and incineration and combustion processes, and volatile organic compounds*». This resolution also stated that the goal of reducing emissions from ships could be better achieved by adding a specific annex into the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78). Annex VI, "Regulation for the prevention of air pollution

[2] *Distillate Marine Fuel* is a grade of maritime fuel. The D stands for "distillate" and "MA" refers to the category. This categorization is based on the ISO 8217 standard used by the IMO, which classifies maritime fuels based on their properties and intended use.
[3] DMZ is the heaviest distillate fuel and is used mainly for emergency motors and for certain types of medium-speed motors.
[4] On 7 July 2023 an important goal was achieved: the creation of a Particularly Sensitive Sea Area (PSSA) in the north-west Mediterranean to protect marine mammals from collisions. This PSSA, which includes the Pelagos Sactuary, has a significant presence of protected species and is heavily trafficked by ships.
[5] Extract from *La decarbonizazzione nel settore dello shipping: recenti sviluppi*, by G. Spera, published in *Rivista del diritto della navigazione*, 2023, 939.

from ships", was subsequently added, in London on 26 September 1997, entering into force on 19 May 2005.
Over the years, Annex VI of MARPOL has been amended several times through resolutions adopted by the Marine Environment Protection Committee of the IMO. The rules of the Annex have been implemented by means of guidelines. Since the 2000s, the issue of greenhouse gas emissions from ships has been the subject of particular attention by the IMO. To this end, the IMO has published several studies which have aimed to use data to monitor the evolution of emissions from ships, in order to adopt measures to further reduce such emissions. The studies called for the establishment of voluntary agreements on greenhouse gas emissions as well as new emission standards for new and – where possible – existing ships. Furthermore, the studies highlighted the need to adopt measures to further reduce greenhouse gas emissions from ships and to assess their impact on the climate. The measures adopted have in fact produced an emission reduction for some categories of ships of approximately 50 to 70%. Emissions from ships continued to decrease in the following years as highlighted in the fourth IMO GHG study in 2020. In particular, the study highlights that "The trends in overall EEOI of oil tankers, container ships and general cargo ships all decreased by 25-26% between 2018 and 2008."
In December 2003, the IMO Assembly adopted resolution A.963(23) on IMO policies and practices relating to the reduction of greenhouse gas emissions from ships. The resolution urged the MEPC to identify and develop mechanisms to limit or reduce greenhouse gas emissions from international maritime transport. In this regard, the MEPC has adopted a series of measures over the last few years aimed at reducing emissions from ships and promoting energy efficiency in the maritime sector. In particular, resolution MEPC.203(62), Chapter IV, entitled "Regulations on energy efficiency for ships", was added to Annex VI of MARPOL. The chapter established requirements for commercial ships of 400 GT (Gross Tonnage) or more, as of 1 January 2013, aimed at establishing a minimum level of energy efficiency, known as Energy Efficiency Design Index (EEDI). The Ship Energy Efficiency Management Plan (SEEMP) was also established, requiring the company to implement the ship's energy efficiency measures. The SEEMP is divided into three parts: the first outlines measures to improve the ship's environmental performance, through efficiency and the reduction of carbon emissions, to be achieved through four phases: planning, implementation, monitoring and self-assessment. The second part describes the methodology used for collecting data regarding the ship's fuel consumption. Finally, the third part describes the measures to be taken to achieve the carbon intensity indicator for the following three years. This last part of the SEEMP is subject to checks and audits by the company, as specified by MEPC resolution 347(78).
Among the further initiatives adopted by the IMO regarding the decarbonization of the maritime sector is the 2020 Global Sulphur Cap, which imposed a limit of 0.5% on nitrogen oxide emissions starting from 1 January 2020, down from the previous limit of 3.5%. During its 79th session, the MEPC also adopted amendments designating the Mediterranean Sea as a "sulphur oxide and particulate matter emission control area" pursuant to Annex VI of MARPOL. In this area, the limit for sulphur in fuel oil used on board ships is 0.10%, while outside these areas the limit is 0.50%. The amendment entered into force on 1 May 2024, while the new sulphur limit entered into force on 1 May 2025. The Mediterranean Sea is the fifth area designated for the control of sulphur oxides and particulate matter emissions worldwide, after the Baltic Sea area; the North Sea area; the North American area and the Caribbean Sea area of the United States.
The effectiveness of the measures intended to reduce GHG emissions requires in-depth knowledge of the subject, including the collection of data and information relating to the actual consumption of fuels by ships. To this end, the MEPC has adopted a resolution establishing a system for collecting data on fuel oil consumption of ships, which will collect data on all CO2 emissions from ships of 5000 GT or more, which produce approximately 85% of emissions. Fuel consumption data can only be transmitted by the flag administration of the ship or by an organization authorized by the flag administration, and the data are used to calculate the aforementioned carbon intensity

indicator.
During its 72nd session, held in London between 9 and 13 April 2018, the MEPC adopted resolution MEPC.304(72), containing the initial IMO strategy on the reduction of GHG emissions from international maritime transport. The session confirmed the need to take urgent action to reduce emissions from ships. The strategy is linked both to the UN Sustainable Development Goal 13 ("Take urgent action to combat climate change and its impacts") and to the 2015 Paris Agreement on Climate Change, which entered into force on 4 November 2016, in which the reduction of GHG emissions is considered essential in the fight against climate change and to reduce the average global temperature. The initial strategy aims to reduce GHG emissions from international maritime transport by at least 50% by 2050 compared to 2008 values. To this end, it provides for the adoption of short-, medium- and long-term measures. In particular, the short-term measures, such as programs for the improvement of the existing fleet and the development of cold ironing, cover the period between 2018 and 2023; the medium-term measures, to be implemented between 2023 and 2030, include the adoption of alternative fuels with low or zero carbon emissions; finally, the long-term measures, to be agreed beyond 2030, are aimed at preparing innovative mechanisms for reducing emissions. In October 2018, the MEPC approved a follow-up action programme to the initial IMO strategy on reducing emissions from ships up to 2023. This document is a planning tool that defines the timeframes identified in the initial strategy. The strategy for reducing GHG emissions from ships was boosted during 74th session of the MEPC in 2019, thanks to the approval of amendments that strengthened the mandatory requirements for new ships in order to make them more energy efficient.
Important innovations were introduced during the 79th session of the MEPC. In particular, resolution MEPC.323(74), on cooperation with ports and national action plans, and resolution MEPC.327(75), which includes references to maritime routes to support decarbonization, were amended. Finally, the strategy on the decarbonization of the maritime sector was further revised thanks to resolution MEPC.377 (80), entitled "2023 IMO strategy on reduction of GHG emissions from ships", which was adopted on 7 July 2023. This strategy, which will be further reviewed in 2028, identifies new and more ambitious targets for reducing GHG emissions from ships, to be pursued through a specific road map. It is expected that the goal of zero GHG emissions from international maritime transport will be reached around 2050, and the goal of reducing carbon intensity by 40% by 2030.
It should be highlighted that the full implementation of the decarbonization process for international maritime transport requires the acceleration of the transition towards less polluting fuels, with low or zero carbon emissions, such as biofuels or hydrogen-based fuels. In this regard, as recently highlighted by UNCTAD in its 2023 report, "Towards a green and just transition", the transition towards alternative fuels is still in its early stages, considering that approximately 98.8 percent of the global fleet continues to use conventional fuels. In fact, only 1.2% uses alternative fuels, especially liquefied natural gas (LNG) and, to a lesser extent, battery/hybrid, liquefied petroleum gas (LPG) and methanol.
At European level, maritime transport accounts for 3.4% of total carbon dioxide emissions. In order to reduce this figure, a monitoring, reporting and verification (MRV) system has been proposed. With this in mind, the European Parliament and the Council have adopted EU Regulation no. 757/2015, concerning the monitoring, reporting and verification of carbon dioxide emissions from maritime transport. In particular, for each ship, shipping companies determine the CO2 emissions, prepare an emissions monitoring plan and submit an annual report on CO2 emissions to the Commission and the authorities of the flag states. Both the monitoring plan and the annual report are subject to verification by independent and accredited verifiers.
Recently, EU Directive 2023/959 of the European Parliament and Council was adopted, which dictates specific provisions on the allocation and surrender of emission allowances in maritime transport; monitoring and reporting of emissions from maritime transport.
In order to increase the demand and use of low-carbon renewable fuels and reduce greenhouse gas

emissions from the maritime sector, while ensuring the smooth operation of maritime traffic and the exclusion of possible distortions in the internal market, the European Parliament and the Council have adopted a new regulation, also known as FuelEU maritime initiative. The new regulation introduces specific measures to ensure that the greenhouse gas intensity of fuels used in the maritime sector decreases by 2% in 2025, with a target of 80% reduction by 2050. In addition, the regulation provides for a special incentive scheme to support the adoption of so-called renewable fuels of non-biological origin (RFNBO) with high decarbonization potential; the exclusion of fossil fuels from the certification process; the obligation for passenger and container ships above 5000 tonnes to use on-shore power while in port from 2030, in order to mitigate air pollution in ports, which are often close to densely populated areas; the creation of a database for monitoring and compliance with the regulation; a voluntary pooling mechanism, whereby ships will be able to share their audit reports with other ships, with the pool as a whole having to meet, on average, the greenhouse gas intensity limits, with time-limited exceptions for the outermost regions. Furthermore, the revenues generated by the implementation of the regulation (FuelEU penalties) will be used for projects supporting the decarbonization of the maritime sector. Finally, important innovations have been introduced by the European Parliament and Council to increase the level of renewable energy supplied to all modes of transport, including maritime. The use of onshore power supply (OPS) or alternative maritime power (AMP), better known as cold ironing, as alternative measures for powering ships during port stays is becoming increasingly widespread. In reality, despite the difference in terminology, it is essentially the same measure designed to reduce greenhouse gas emissions and pollutants from ships during port stays, through the use of electrical energy from land. The term cold ironing, in fact, usually means supplying land-based electricity to ships in port. If the electricity source is environmentally friendly, this makes it possible to eliminate the emissions of auxiliary engines while ships are moored. Cold ironing thus contributes to the decarbonization of the maritime sector, while supporting green shipping. Case studies have shown that the use of cold ironing can also bring significant financial savings when the price of fossil fuels is high. Therefore, onshore power supply can be a useful way of reducing emissions in the maritime sector, provided that regulatory bodies support the further adoption of the technology by ship and port operators. Further benefits of cold ironing include the reduction of noise pollution and the improvement of the working conditions for crews and port operators, thanks to lower exposure to polluting fossil fuels. In order to encourage measures to reduce polluting emissions in the port area, the European Maritime Agency has developed a guide on shore-side electricity (SSE), to provide assistance to port authorities and national administrations. The guide consists of two parts: the first concerns equipment and technology; the second concerns planning, operations and safety.

Ultimately, cold ironing is a measure aimed at supporting the transition towards greener and more sustainable fuels, implemented both at international level by the IMO and at EU level. In this regard, the IMO Maritime Safety Committee (MSC) has recently adopted guidelines aimed at ensuring the safety of the operation of the onshore power supply (OPS) for ships engaged in international voyages during their stay in port. At EU level, art. 4 of EU Directive 2014/94 expressly provides that Member states shall assess in their national strategic frameworks the need for shore-side electricity supply for inland waterway vessels and seagoing vessels in maritime ports and inland waterway ports. Shore-side electricity supply must be installed, as a priority, by 31 December 2025 in ports of the TEN-T core network, and in other ports, unless the costs are disproportionate to the benefits, including environmental benefits. Furthermore, it should be noted that reducing CO2 emissions from ships in port, through the mandatory use of shore-side electricity networks, is one of the priorities of the European Green Deal. The adoption of the new regulation on the FuelEU maritime initiative has given further impetus to the development of cold ironing. In particular, under Article 6 of the regulation, from 1 January 2030, ships in port in a member state must be equipped with a system that allows them to be electronically powered from the dock through the onshore power supply (OPS) system.

In the White Paper of 28 March 2011, entitled "Roadmap to a Single European Transport Area — towards a competitive and resource-efficient transport system", the European Commission highlighted the need to reduce the maritime transport sector's dependence on oil. To this end, it stated that a series of strategic initiatives were needed to achieve this objective, including the development of a sustainable strategy for alternative fuels and related infrastructure. The maritime transport sector is still heavily dependent on fossil fuels, which is why the IMO has adopted a series of initiatives in recent years aimed at making the decarbonization of the sector effective in order to reduce emissions from ships. The European Union has also moved in this direction. The solutions proposed both by the IMO and the EU are essentially based on the implementation of renewable and low-carbon fuels as well as on the use of renewable energy sources.
Despite the efforts made and the measures implemented at various levels, the decarbonization of the maritime sector is still far from being fully achieved. As highlighted by the United Nations Conference on Trade and Development (UNCTAD), in the decade between 2012 and 2022, CO2 emissions from container ships decreased by 21%, for cargo and bulk ships by 18%, while for tankers by only 1%. These data highlight that the various segments of the merchant fleet have different levels of emissions. This means that the measures to be adopted should focus, at least initially, on the most polluting segments. Additional measures are also necessary. For example, replacing the most polluting segments with new-generation commercial ships equipped with sustainable and low-impact propulsion systems; developing electric-powered unmanned vessels and new technologies; transitioning to alternative fuels; introducing a liability regime for shipping companies to control emissions. As regards the port area, greater impetus must be given to the renewal of port infrastructure, in particular cold ironing, in order to allow commercial ships to operate with zero emissions while in port. The transition to a sustainable model of the maritime sector through the aforementioned measures will increase the cost of logistics and maritime transport in the short term, but it will allow long-term environmental and economic benefits. Accelerating the decarbonization of the maritime sector is an absolute priority that can no longer be postponed, not least because it will reduce the uncertainty that currently affects investment decisions. In this sense, an important role could be played by the stakeholders of the maritime sector themselves through specific initiatives aimed at facilitating the decarbonization of shipping, such as the development of green corridors and tariff incentives in favor of green ships. Ultimately, the harmonized and global adoption of the measures examined could allow the pursuit of the objective set by the IMO of a deep decarbonization of the maritime sector by 2050.

3. Deep dive: Maritime Emission Trading System (ETS)

The European ETS, established in 2003, is the world's leading cap & trade system, covering several sectors including energy, heavy industry and aviation. The scope of the ETS has been extended to maritime transport by Directive (EU) 2023/959 of the European Parliament and Council of 10 May 2023. Therefore, ships with a gross tonnage of over 5000 GT calling at European ports will be gradually included in the ETS as follows:
- in 2025, shipping companies will have to pay 40% of the CO2 emissions generated in 2024 on intra-EU voyages and in EU ports;
- in 2026, they will have to pay 70% of the CO2 emissions generated in 2025 on intra-EU voyages and in EU ports;
- from 2027 onwards, 100% of the previous year's emissions, including CH4 (methane) and N2O (nitrogen oxide) emissions expressed in CO2 equivalent.

The ETS system came into force for the maritime sector on 1 January 2024, with this year's emissions having to be reported for ETS purposes for the following year.

The percentages are halved for emissions generated on journeys into or out of the EU (so-called extra-EU routes).
The Directive introduced an exemption until 31 December 2030 for naval units that operate connections with the smaller islands (under 200,000 inhabitants), and a corrective to avoid carbon leakage during transshipment.
The ETS system requires shipping companies to purchase permits (EUA) for each ton of CO2 emissions released into the atmosphere, as recorded during the previous calendar year.
Approximately 75% of the funds from the sale of these permits is allocated to the member states, while the rest is allocated to the European Union budget and direct European funds (Innovation Fund, Modernization Fund, Social Fund for the climate).
Under Article 10 of the ETS Directive, the funds allocated to the member states should be used for activities aimed at decarbonizing. In the case of the maritime sector, letter (f) of Art.10 specifies that the "decarbonization of the […] maritime sector including the improvement of the energy efficiency of ships, ports, innovative technologies and infrastructures and sustainable alternative fuels, such as hydrogen and ammonia produced from renewable sources, and zero-emission propulsion technologies […]".
According to the forecast based on the 2022 data for European shipping, adjusting to take into account the volatility of the factors that dictate the distribution of ETS funds among the member states, the revenues for the state from the maritime sector will be around 300 million euros in 2025 alone (increasing in subsequent years as a progressively higher percentage of emissions have to be paid for).
In addition to the economic burden, the ETS also places a significant administrative burden on shipping companies, in order to comply with the obligations, particularly the monitoring of emissions from ships, as per the 2015 Monitoring and Reporting Regulation (MRV).
The Directive is due to be reviewed either in 2026 or when the IMO approves a global measure to reduce emissions similar to the ETS, for example a carbon tax.

The negative consequences of the European ETS on transhipment.

Being a "regional" measure, limited to the European Union but with international projections due to the inclusion of extra-EU/EU routes (at 50%) in the scope of the rule, the application of the ETS to the maritime sector generates the following distortions:
- it encourages the relocation of transshipment activities to non-EU ports, reducing the competitiveness of European ports and generating negative impacts on local economies;
- it encourages the transfer of port activities to third countries, which compromises the safety and resilience of European logistics and supply chains, especially in the event of security crises, disruptions or extreme weather events;
- it generates a loss of commercial traffic in EU ports, which could cause a reduction in employment and a drop in economic income in the communities and territories that host the ports.

The issue was addressed during the negotiations on the ETS Directive, with the introduction of a corrective deemed insufficient: the so-called "300 nautical mile rule". This rule, which recognizes the risk of traffic diversion to transshipment ports in third countries, establishes that such ports are not considered as "ports of call" for the purposes of the ETS. Consequently, a longer distance is applied for the calculation of emissions, requiring the payment of a longer international leg in the event of a subsequent call in Europe.
However, the 300 nautical mile rule, as currently in force, fails to effectively reduce the risk of delocalization and carbon leakage during transshipment. In particular, in the case of international routes with a single stop in a European port that serves as a transshipment hub, the rule is ineffective, because when the transshipment operations are moved to a port in a third country, the ETS no longer applies. This entails the risk that transshipment hubs in the Mediterranean could lose up to 50% of their traffic, a significant share of international trade.

For international routes with multiple stops in European ports, it is often more advantageous to call at a transshipment port in a third country, before reaching Europe, rather than at an EU transshipment hub, despite the 300 nautical mile rule. In fact, calling at a transshipment port in a third country, covered by the 300 nautical mile rule, and then stopping at a European port, means that shipping companies only have to report 50% of emissions for the leg from the non-EU port to the transshipment port, up to the next EU port. On the contrary, calling at a transshipment hub in the EU and then at other European ports obliges companies to account for both 50% of emissions for the international leg and 100% of emissions for the intra-European leg. In many cases, reporting it this way is more advantageous than full reporting of intra-European legs, thus encouraging the choice of non-EU transshipment ports. The European Commission and some member states proposed to solve this problem by expanding the list of third country ports subject to the 300 nautical mile rule; however, in most cases this does not appear to address the risk of relocation and carbon leakage.

The above situation seems to be confirmed by the increase in traffic to the United Kingdom (a clear indicator of carbon leakage) and by the huge investments in North African ports to increase their capacity and attract traffic from the European Union due to climate measures.

The current situation in Europe on the Emission Trading System can be summarized as follows:

- the European Commission monitors the application of the ETS to the shipping market, but does not intend to intervene in the absence of scientific data proving carbon leakage and rerouting.
- the member states in the Council (transport side) have asked for a different methodological approach and are pushing for an agreement in the IMO on a global measure[6];;
- the European Parliament, which completed the establishment phase of the new legislature on 1 December 2024, will debate the issue on several occasions, but will not have decision-making power.

The implications of the European debate on the ETS at the IMO.

The current negotiations underway at IMO level, which focused during the 82nd MEPC session on two medium-term measures – a "technical" Global Fuel Standard and a universal financial contribution to the reduction of greenhouse gases (GHG) – raise the possibility that the debate will focus on certain specific issues. These issues, already addressed in the past at European level, include first and foremost the reuse of financial resources deriving from climate taxation and the level of ambition of the greenhouse gas emission reduction coefficients. Below, some reflections of the European debate that could be relevant to the IMO:

- Holistic approach on the two measures. In Europe, the ETS and FuelEU Maritime have been discussed separately and neither an impact assessment nor a political discussion of the two measures considered together has ever been carried out. This has caused serious distortions of both a technical and economic nature. On the contrary, the IMO approach must be holistic and the two measures (technical and economic) must be assessed jointly and introduced simultaneously, avoiding deferred entry for the economic measure, as proposed by some states.
- Principle of technological neutrality and reuse of financial resources. Although the European legislation on the energy transition of the maritime sector (Emission Trading System and FuelEU Maritime) is based on the principle of technological neutrality, the European Commission and the Northern European member states have a clear preference for a short-term transition towards synthetic fuels. Proof of this is the EU's submission, presented in the summer of 2024 for MEPC 82. The submission was discussed at length at the Council of the European Union, because it initially stated that the funds raised by the two IMO medium-term

[6] See *Council of the European Union's Information note, Call to action to adequately monitor the extension of EU ETS to Marine Transport, 11036/1/24 REV 1TRANS 307, 14 June 2024*

measures should finance exclusively synthetic fuels; however, it is desirable to use these funds to finance *all* types of sustainable marine fuels, in accordance with the spirit of the European measures (which have also been approved by Italy);

- The urgency of approving a global measure to re-establish a level playing field. In accordance with requests by member states (including Italy) in the Transport Council on 5 December 2024[7], the approval of a global carbon tax on maritime emissions will make it possible to re-establish a level playing field between European regional taxation and global taxation. However, it will be important to ensure flexibility and integration between the two mechanisms, since it will be difficult for the European Union to renounce the application of the ETS to the maritime sector, as the latter is a significant source of revenue for the budgets of the EU and the member states;
- The need to align European measures with future global measures. Currently, IMO reporting and the European Union MRV/ETS reporting are misaligned. In the event of approval of a medium-term measure similar to the ETS (GHG fuel price), it will be necessary to align the reporting tools and taxation levels of international traffic, promoting flexibility and complementarity between European standards and single standards.
- The need to develop an operational regulatory framework that is immediately in force. To avoid the current confusion in Europe on fuel certification and the relevant operational considerations, it will be essential to implement, together with the medium-term measures, guidelines or regulations that clearly and unequivocally define the use and reporting schemes for alternative fuels, paying particular attention to the book and claim system, as it is not accepted in the EU. To this end, it is essential to draw up a clear list of "eligible" fuels to comply with the IMO measures, following the model of the European RED and related delegated acts.

4. Italy's role in the Maritime Safety Committee

During 2024, the topic of developing a non-binding code for Maritime Autonomous Surface Ships (MASS) received a great deal of attention. Work continued both during the Committee sessions and in the working groups parallel to the plenary and in inter-sessional work. Italy actively contributed to the drafting of Chapter 25 of the Code, on “towing and mooring”. The most active states on this topic were the United Kingdom, Denmark, Norway, Germany, Japan, the United States and Russia (all with strong interests in the field of MASS vessels), together with organizations such as the International Marine Purchasing Association (IMPA), the International Hydrographic Organization (IHO) and the Nautical Institute. Work on the drafting of the Code is ongoing, although some sections require more time than others. This is due to the complexity of the subjects covered, the need to cross-check regulatory checks to avoid duplication with existing international regulations, the new operational scenarios related to MASS vessels, and the search for a delicate balance in language: on the one hand, to avoid excessively constraining the possibilities offered by technology, and on the other, to ensure a precise basis for the programming and validation of software. An example of such complexity is the chapter on search and rescue operations.

Regarding the sensitive issue of unsafe migration by sea, draft guidelines for captains of merchant ships on the recovery of dead bodies from vessels have been approved. Initially, the guidelines only covered cases of migration by sea, but during the December session of MSC 109 this reference was

[7] The joint declaration, drawn up by Italy and signed by Bulgaria, Croatia, Cyprus, Greece, Malta, Portugal, Romania and Spain, which was discussed in theTransport Council on 5 December 2024, and which reads "*While we strengthen our final efforts to achieve ambitious solutions at IMO level to safeguard competitiveness of EU shipping and Ports, we also wish to emphasise that the review clauses contained in the EU ETS Directive will need to take into account the risk of future double payment due to international and regional measures. Therefore, it is of the utmost importance that regional measures need to be adjusted as soon as possible in view of new global international measures*”

deleted. Italy, substantially in agreement with the introduced amendment, pointed out that in the aforementioned guidelines the role of the flag state was not consistent with the provisions of numerous IMO instruments (including the SAR Convention, the Solas Convention V/33, Res MSC 167(78) para 3.1, IMO circular FAL 2 /circ 194, Res MSC 528(106)). Given the relevance of the topic and the specific observations proposed by the Italian delegation, during the subsequent passage scheduled for approval by the FAL in 2025, Italy will propose amendments for which it has already requested the co-sponsorship of other member states. The MSC always carefully monitors the issue of piracy and maritime security, on which timely updates are provided at each session of the Committee. In this area, ample space is now occupied by cybersecurity and the revision of the current guidelines. Italy, together with EU member states and many others, has proposed to further develop unified cybersecurity standards for ships and port facilities to ensure consistent application that meets a minimum level of cybersecurity.
Finally, in parallel with the work conducted in the MEPC, the MSC also addresses the reduction of greenhouse gas emissions, in particular in the context of developing safety standards. All the "obstacles" to be addressed in the IMO instruments are being analyzed and all the necessary actions for the individual sub-committees are being defined, with a report expected for the next Maritime Safety Committee (MSC 110). This work and the amendments to the International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels (IGF Code) are particularly relevant for alternative fuels such as ammonia and hydrogen, which are crucial to reduce greenhouse gas emissions from ships.

5. The simplification process in the maritime sector carried out within the FAL Committee

The FAL Committee, which met in April 2024, expressed concerns regarding the safety of navigation in the Red Sea and Black Sea areas, and discussed the revision and update of the Explanatory Manual of the FAL Convention. This Manual provides guidance on the interpretation of the legal provisions of the Convention and proposes examples of good practices for their implementation.
In relation to the Maritime Single Window (MSW) – see section 6 below – the Committee received reports from member states on their experiences in implementing the MSW. A proposal for the revision of the guidelines on authentication, integrity and confidentiality of information exchanges via MSW was considered. In addition, an expert group was tasked with assessing the inclusion of Application Programming Interfaces (API) information in the IMO Compendium on Facilitation and Electronic Commerce.
The Committee also considered the request of the International Association of Ports & Harbors (IAPH), which requested the preparation of a proposal to amend the Annex to the FAL Convention and introduce mandatory requirements on cybersecurity. In this regard, member states and international organizations were invited to define the proposal to be submitted to FAL 49. Furthermore, the Committee announced the launch, in September 2023, of a new e-learning course on the implementation of the MSW, available on the IMO e-learning platform.
Regarding the measures needed for the non-mandatory code covering autonomous surface vessels (MASS), the Committee took note of and approved the report of the joint MSC-LEG-FAL working group, which includes, among other points, recommendations relating to the role and responsibilities of the master/crew in the context of the MASS, the role and responsibilities of the remote operator and remote operations centers, certificates, information sharing, connectivity and cyber security.
In relation to digitalization initiatives, also driven by various proposals and recent surveys conducted by partners in the field of port digitalization, the Committee agreed to include in its agenda for FAL 49 a specific item on "Development of a comprehensive strategy on maritime digitalization," due to be completed by 2027, and invited MSC and MEPC to become associated bodies.

Regarding the qualification of key-worker for seafarers, it was agreed to that the 2024-2025 biennial agenda of the FAL Committee and the provisional agenda of FAL 49 would include an output on "Amendments to the FAL Convention to review the provisions of a key worker during a public health emergency of international concern," with a completion year due in 2026.
Finally, the proposal submitted by Italy, Spain and the United Arab Emirates to update the guidelines on the minimum education and training of mooring personnel was referred back to FAL 49 on the basis of the comments made by the plenary.

6. Deep dive: The state of the art of the maritime single window[8]*.*

Nowadays, the maritime transport sector, similarly to air transport, is affected not only by the energy transition, but also by the need to simplify and digitize the administrative procedures that precede the ship's commercial operations. There is still considerable bureaucracy involved in the arrival and departure of ships: there are various formalities in which various public administrations are involved, with the goal of allowing the ship to carry out its commercial operations. Similarly to air transport, time is also an essential factor in maritime transport. In fact, the longer the ship stays in port, the higher the costs, both administrative (such as port taxes) and operational (keeping the ship running). In addition, there are the costs of port services that are required during port operations, such as waste collection from ships in port or the services of the maritime agent. It is therefore a priority for the international maritime transport sector to facilitate and simplify maritime traffic, reducing to a minimum the formalities, documentary requirements and procedures relating to the arrival, port stay and departure of ships engaged in international voyage.
The growth of international maritime transport has led to an increase in the bureaucracy. The quantity of documents required by the national authorities responsible for managing and controlling maritime traffic varies from port to port. The IMCO (Inter-Governmental Maritime Consultative Organization), under pressure from the principal maritime states, therefore adopted on 13 April 1961 resolution A. 29 (II) on the Facilitation of Travel Transport, authorizing the Secretary-General, with the approval of the Council to "convene a meeting of experts or to set up a working group, as appropriate, to advise the Council and the Secretariat in fostering specific aspects of the work program in this field […]". On 25 October 1963, the third assembly of IMCO adopted resolution A.63 (III) approving the report of the group of experts and in particular recommending the drafting of a convention to be adopted at an IMCO conference in the spring of 1965. The conference duly took place on 9 April 1965, and the Convention on the Facilitation of International Maritime Traffic (FAL) was adopted. In the subsequent conference of 27 September 1965, the IMCO adopted resolution A.78 (IV) with which it decided to "accept the obligations arising out of the Convention, its Annex and Resolutions of the Conference and, in particular, to endorse the implementation by the Organization of Resolution 4 concerning the establishment of an ad hoc working group".
The digital transition of the maritime sector is driven by the need to reduce the time spent in port, by making port operations faster and by simplifying the formalities involved in arrival and departure. This has led the IMO to promote the Maritime Single Window (MSW), a maritime one-stop shop through which maritime operators carry out the administrative and operational formalities for commercial operations. In order to give further impetus to the initiative of the Maritime Single Window, the IMO Facilitation Committee adopted a new resolution in 2023 which became mandatory from 1 January 2024. The resolution highlights the advantages of one-stop shops in the ports of the states that are parties to the Convention. In particular, the resolution:

[8] Extract from G. SPERA, *Maritime Single Window Environment e E-Digitalization*: Le nuove frontiere dei trasporti marittimi, in Rivista di diritto dell'Economia, dei Trasporti e dell'ambiente, vol. XXII/2024, 301.

a) urges governments to adopt, implement and effectively apply the concept of a maritime one-stop shop to the customs clearance of ships;
(b) invites governments that have made the most progress in implementing the Maritime Single Window to share their know-how and experiences with states seeking assistance in developing their own Maritime Single Window;
(c) encourages governments to use the IMO Compendium on Facilitation and Electronic Commerce to develop electronic information exchange systems to ensure harmonization and interoperability between systems and stakeholders.
The exchange of digital information through Maritime Single Windows is regulated by specific guidelines adopted by the Committee. These guidelines also aim to ensure the harmonization and standardization of the information. While the digitalization of the maritime sector has reduced the bureaucracy associated with maritime operations, it also exposes the system on which the Maritime Single Window is based to cyber threats that can not only delay the administrative activity of the public authorities involved, but also cause damage to the entities operating in the international maritime transport sector. To this end, the IMO Maritime Safety Committee has developed guidelines to prevent the threat of cyber attacks on digital systems in the maritime sector, calling on shipping companies to address cyber risks in their safety management systems.
Maritime transport is the backbone of trade and communications within and outside the Single Market. Around a third of all intra-EU goods and three-quarters of international trade travel by sea.
Currently, member states have national Maritime Single Windows, to which maritime operators electronically transmit the information on ships arriving and departing. The member state's existing Maritime Single Windows should be maintained, to be used later as the basis for a technologically neutral and interoperable European Maritime Single Window system. With Implementing Regulation (EU) No 204/2023, the EU defined: the common functionalities of the graphical user interface and the content of the harmonized digital spreadsheet templates; the technical specifications for making the arrival and departure times of ships publicly available; the harmonized structure for the website supporting the Maritime National Single Window; the uniform format for internet addresses; the technical specifications, rules and procedures for the establishment of the European Maritime Single Window Environment database for ships; the technical specifications, rules and procedures for the establishment of the common database of sites; the technical specifications, rules and procedures for the establishment of the common database of HAZMAT (Hazardous Material); the information for the summary entry declaration to be submitted to the Maritime National Single Window.
The Ministry of Infrastructure and Transport (Port Authority General Command – Coast Guard) is the authority responsible for establishing Italy's national Maritime Single Window, pursuant to Legislative Decree no. 179 of 18 October 2012. The Italian legislator has designated the aforementioned General Command as the competent national authority, which acts as national coordinator for the European Maritime Single Window and exercises the functions referred to in Articles 5, 12 and 18 of the aforementioned EU Regulation no. 1239/2019. The methods of exercising the coordination functions assigned to the Coast Guard for the application of EU Regulation no. 1239/2019 were defined by Interministerial Decree no. 135 of 30 August 2023. In particular, the decree provides for forms of cooperation between the competent internal administrations, namely the Ministries of the Interior and Health, the Customs and Monopolies Agency and the Guardia di Finanza Corps, in order to ensure interoperability between their IT systems. A Coordination Committee has been set up at the Coast Guard Corps to ensure interoperability between the systems used by the other internal authorities and to facilitate the implementation of the European Maritime Single Window (EMSW) system.
The digital transition of maritime transport is constantly evolving. The digitalization of the maritime sector offers undeniable advantages compared to paper, such as the automated verification and analysis of information, data processing, and easy sharing and archiving of information. Through a more efficient use of resources and better use of information and communication tools and technologies, digitalization not only promotes the competitiveness of international maritime

transport, but also has a positive impact on the environment and working conditions. Harmonizing reporting procedures for the ship's captain and crew having a single point of contact for customs and maritime declarations also generates important benefits for the maritime sector, not only in terms of greater sustainability and better quality of work on board ships, but also in terms of reducing administrative burdens and saving time. Furthermore, speeding up reporting procedures reduces the time spent in port, helping reduce greenhouse gas emissions in the port area. By reducing the administrative and operational costs of the ship, the Maritime Single Window makes the maritime transport sector more competitive, with benefits for shipping companies and other companies operating in the maritime sector, and in terms of GDP growth. Another aspect that should not be underestimated is that the digital information transmitted through the Maritime Single Window can be used to improve the efficiency of the maritime transport of goods and the related multimodal and logistics services. In fact, the appropriate reuse of digital information allows transport and logistics service providers to optimize the flow of goods entering and leaving ports in real time, as well as making port services and operations more efficient.

The administrative procedures for ships' commercial operations is being simplified and digitalized, not only at international level, but also at EU level. The implementation of the Maritime Single Window is producing important results in the maritime transport sector, by reducing ships' port stay times, reducing costs and improving working conditions on board ships, and by reducing greenhouse gas emissions in the port area. The digitalization of the maritime sector improves the efficiency and reliability of reporting procedures for the ship's captain; however, it also entails risks related to the security of digital information transmission systems. Prevention and protection against attacks targeting such systems is a priority that goes hand in hand with the need for systems that are open to continuous technological evolution. These systems must also guarantee the interconnectivity and coordination of transport and customs declarations, and must make maritime transport and the digital multimodal logistics chain more efficient and environmentally sustainable. In this regard, it should be highlighted that the maritime insurance sector has been affected by the risk of cybercrime and the possible damage from attacks on ships' IT systems. In fact, maritime insurance companies increasingly specifically exclude coverage for damage resulting from cyberattacks – using clauses such as the cyber loss absolute exclusion clause and the cyber loss limited exclusion clause – with the inevitable consequence of penalizing commercial traffic. Furthermore, it seems appropriate to highlight that, to date, some electronic data transmission processes are still based on outdated procedures that require a thorough review. In fact, according to a recent survey, in 64% of ports worldwide, port authorities still require paper documentation or a combination of paper and digital communications. On average, the time taken to submit the necessary documents requested at each individual port is approximately three hours. Furthermore, the survey highlighted the need for standardized and harmonized digital systems in ports around the world, as well as a lack, on many ships, of IT infrastructure to ensure more efficient data exchange with ports. It therefore remains necessary to find solutions to improve the electronic transmission processes of information; enable the reuse of data already submitted; eliminate unnecessary reporting obligations and optimize the processes related to port and commercial operations of ships during their stay in port. This would improve the maritime transport sector and logistics with more efficient use and reuse of the digitalized information currently produced and collected by the parties and administrations concerned.

In this context, it would be useful to use modern information technologies, including artificial intelligence (as is already the case in some sectors of maritime transport, such as uncrewed vessels and logistics), in order to help implement the Maritime Single Window and simplify the administrative procedures for arrival and departure.

7. Technical cooperation.

The Technical Committee, which met in June 2024, addressed a number of key issues relating to safety of navigation, technical cooperation and capacity building in the maritime domain. The discussions included concerns about safety of navigation in the Red Sea and Black Sea and the need to develop an integrated strategy to improve the capacity and training of maritime personnel.
In the context of the capacity building strategy for the period 2021-2030, the Committee reviewed:
• training for maritime search and rescue (SAR), a crucial area for ensuring safety in maritime operations, especially in sensitive regions.
• the results of technical cooperation activities in 2023, which showed a 75% implementation rate, with a total expenditure of 19.9 million USD, demonstrating the effectiveness of the Integrated Technical Cooperation Programme (ITCP).
The Committee discussed the proposal to strengthen the global maritime training and development network through:
• Maritime training institutes (METs): improving their capacity to train professionals with specific skills and technical knowledge, in line with greenhouse gas (GHG) emission reduction targets.
• New training courses: designed to respond to environmental and technological challenges, with a focus on more effective teaching models.
Particular emphasis was given to the Junior Professional Officer (JPO) and Senior Professional Officer (SPO) programs, with the aim of:
• Supporting developing countries, in particular Small Island Developing States (SIDS) and Least Developed Countries (LDCs): through increased access to training opportunities.
• Promoting funding to expand access to programs for ITCP beneficiaries, promoting more inclusive participation.
The Committee also reviewed progress in implementing the 2021-2030 capacity building strategy, with particular attention to:
• establishment of regional offices. Updates were given on the Regional Presence Office (RPO) in Alexandria for the Arab States in the MENA region and on the progress made in the Pacific Islands, thanks to the Memorandum of Understanding (MoU) signed in March 2024 by Fiji, which aims to make an RPO operational by the end of 2024.
• regional projects, such as India's project to establish the South Asia Centre of Excellence for Sustainable Maritime Transport (SACE-SMarT), intended to be a national center of excellence with a regional dimension, aimed at supporting partners in South Asia.
Furthermore, the Committee noted the progress of the global IMSAS program, which is completing the first inspection cycle for all member states. The Committee highlighted the importance of a continuous improvement process, based on feedback from member states, as well as the importance of auditor training to ensure the quality of inspections and support to member states in preparing for audits.
The Committee examined the report of the Governing Board of the International Institute of Maritime Law of the IMO for 2022 and the related budget. It also highlighted the value of the collaboration with:
• the International Academy for Maritime Safety and the Environment (IMSSEA), located in Italy, for short and medium-term specialist training.
• the Institut Portuaire d'Enseignement et de Recherche (IPER), located in France, for high-level courses in the maritime sector.
Finally, the Committee reiterated the need to refine the vision and mission of the 2021-2030 capacity building strategy, with the aim of ensuring greater effectiveness in training and technical cooperation activities, with a particular focus on strengthening regional capacities and implementing inclusive programs that can respond to global challenges in the maritime sector.

8. Legal aspects addressed within the LEG committee.

During the meeting of the Legal Committee (LEG) of the IMO, held in April 2024, several issues of legal relevance for the global maritime sector were addressed, ranging from safety of navigation to issues of international law and the protection of seafarers. The Committee analyzed the state of progress of protocols and regulations, examined emerging challenges in the sector, and discussed innovative solutions to address current and future issues.

The Committee expressed deep concern about the growing insecurity in the Red Sea and Black Sea areas, linked to geopolitical conflicts and illicit activities. The measures adopted to ensure the safety of navigation in these regions were assessed, with particular attention to the need for coordination between states, regional organizations and international organizations. The LEG also took note of the updates provided by the United Nations Security Council regarding piracy, and considered recommendations to strengthen multilateral cooperation and counteractions.

There was a particular focus on the 2010 Hazardous and Noxious Substances (HNS) Protocol, aimed at regulating liability and compensation for damage caused by the carriage of hazardous and noxious substances by sea. The Committee reviewed the progress of ratification and implementation of the Protocol by member states, stressing the importance of broadening global participation to ensure adequate coverage. In addition, unified interpretations of the Protocol were discussed, in order to provide uniform and consistent application of its provisions, with the aim of avoiding divergent interpretations between jurisdictions. A central theme was the fair treatment of seafarers, with particular reference to the abandonment of seafarers by shipowners. The Committee examined a detailed report on the joint IMO/ILO database that monitors abandonment cases, reporting on an analysis of incidents recorded in 2023.

The main causes of abandonment were identified and new operational guidelines were promoted to assist states in identifying and promptly addressing such cases.

Measures proposed included improving cooperation between flag states, port states and states of residence of seafarers; strengthening preventive measures to ensure that shipowners comply with contractual and financial obligations; and using available funds to support abandoned seafarers.

The Committee addressed the phenomenon of so-called shadow fleets or dark fleets, i.e. fleets of ships operating outside of official registration regimes, often using fraudulent registrations. A dedicated working group presented a report highlighting both the main fraud techniques used in ship registration and the legal and operational consequences for states and for global maritime security.

In this regard, measures were proposed, supported by the Italian delegation, aimed at improving the transparency of ship registers, including strengthening controls on open flag registers; introducing more stringent requirements for verifying the identity of shipowners and operators; and promoting technological tools, such as centralized databases and blockchain, to ensure greater traceability of ships.

A further point of discussion concerned the development of international guidelines for the use of electronic certificates and documents by seafarers. In this regard, the use of digital technologies was identified as a key solution to simplify operations and improve the efficiency of the sector. The Committee highlighted the importance of standardizing technical and legal requirements for electronic documents; ensuring data security and integrity through advanced encryption systems; and providing training programs for seafarers and competent authorities to facilitate the transition from paper to electronic documents.

The Committee discussed the legal implications of the development of autonomous vessels (MASS), in collaboration with other IMO committees. The drafting of a non-mandatory code for these vessels was discussed, with particular reference to the liability regime of shipowners and

operators; the regulation of certification for autonomous vessels; and the management of risks relating to cyber security and liability in the event of accidents.

The Committee also examined the issue of containers lost at sea, which pose a threat to both the safety of navigation and the marine environment. The Committee examined measures to improve the reporting of lost container incidents, technologies for recovering lost containers, and the legal responsibilities of shipowners and port operators in such cases.

Finally, the LEG analyzed the annual report on technical cooperation activities, highlighting the progress made in 2023 and highlighting the role of the IMO International Maritime Law Institute (IMLI) in providing high-level specialized training with particular reference to the training of legal experts from developing countries.

Italy's role in the International Oil Pollution Compensation Funds (IOPC FUNDS) and the International Maritime Satellite Services Organization (IMSO)

CHAPTER III

The Italian Permanent Representation in the IOPC FUNDS and in the IMSO

SUMMARY: 1. ITALY'S CONTRIBUTION TO THE ACTIVITY OF THE IOPC FUNDS – 2. THE MAIN MEASURES ADOPTED BY THE IOPC FUNDS IN 2024. – 3. ITALY'S PARTICIPATION IN THE WORK OF IMSO.

1. Italy's contribution to the activity of the IOPC FUNDS

Ambassador Antonio Bandini was for several years both the President of the Executive Committee of the IOPC Funds and the President of the Coordination Commission for the IOPC Funds at the Presidency of the Council.
At the end of the last Assembly of the 1992 Fund, held from 5 to 8 November 2024, Ambassador Bandini ended his term as president after 4 years, receiving the profound and shared appreciation of the Assembly for the excellent work done.
Italy's participation in the work of the IOPC FUNDS is coordinated at the national level by the Interministerial Coordination Commission of the International Oil Pollution Compensation Fund (IOPC) established by the Prime Ministerial Decree of 30 August 1999. In particular, the Commission coordinates at the national level the initiatives of the various administrations involved (State Attorney General, Ministry of Foreign Affairs and International Cooperation, Infrastructure and Transport, Economy and Finance, Environment, Economic Development) in order to determine Italy's positions at the IOPC FUNDS on the issues of pollution by hydrocarbons and other polluting materials by international maritime transport.

2. The main measures adopted by IOPC FUNDS in 2024.

The 29th meeting of the 1992 Fund, the 83rd Session of the Executive Committee of the 1992 Fund and the 29th Session of the Supplementary Fund Assembly of Contracting Parties to the IOPC FUNDS were held at the IOCPF Headquarters in London from 5 to 8 November.
To date, 121 states have ratified the Funds Compensation Convention, with the Republic of Iraq soon to ratify it. Currently 80 states are parties to the Supplementary Fund Convention. The session approved the budget for 2025, which included an increase of 7.3%.
The 1992 Fund is currently managing 15 ongoing incidents, including two new incidents in 2024: the Marine Honour in Singapore and the Terranova incident in the Philippines. The documents relating to these incidents have been submitted to the Executive Committee for consideration. Updates were also provided on other ongoing maritime incidents:

• Princess Empress: Significant progress has been made in managing the incident, with thousands of claims being filed from the heavily damaged fishing industry;
• Gulfstream: Clean-up operations related to this incident have been completed in Tobago. In this regard, the representative of Trinidad and Tobago told the Assembly that the funds allocated to

compensate for the damage caused by the incident are not sufficient. The Fund gave assurances that the damages will be covered;
• Marine Honour: On 14 June 2024, a collision with a dredger generated an oil spill of over 800m^3, which contaminated the waters of the port of Singapore and the east coast of Malaysia. Clean-up operations in both locations have been completed;
• In addition, further developments were reported regarding the claims in the following cases: Prestige - Solar 1 – Redfferm - Haekup Pacific - Alfa I - Nesa R3 - Nathan E. Stewart - Agia Zoni II - Bow Jubail - MT Harcourt - Accident in Israel.
Particular attention was paid to the issue of the transport of hydrocarbons carried out by vessels that are uninsured and that do not adhere to the safety standards required by international law. This issue was analyzed by the European Union for the first time during a coordination meeting, where a common position was developed. The European Union announced new economic sanctions packages (12th, 13th and 14th packages) which concern, among other things, the transfer of ownership of tankers involved in the transport of oil and liquefied natural gas. This has raised concerns about the risk of environmental accidents arising from vessels that do not comply with safety and insurance standards.

Discussion on Criminal Proceedings
During the discussions, many delegations expressed concern about the inclusion of references to criminal proceedings in the draft resolutions, considering them outside the context of the international liability regime. It was decided to remove these references in order to facilitate the rapid adoption of the resolutions.

Report on the movement of hydrocarbons.
With regard to the obligation of member states to report annually to the IOPC FUNDS on the volume of hydrocarbons received, as required by the International Convention on Civil Liability for Oil Pollution Damage (CLC) and the 1992 IOPC Convention, it was noted that only one state had failed to provide the required report. This state was consequently excluded from election to the Executive Committee (which Italy was elected to).

Proposed Amendments to Resolutions
Some delegations, such as India, proposed amendments to improve the wording of the resolutions, in particular with regard to the definition of "ship" and the liability of the shipowner. The proposed changes were discussed and considered for future sessions.

Ratification of the HNS Convention, 2010
The Director updated the Assembly on the status of the HNS Convention, 2010, noting that eight states were already signatories, but that at least twelve were needed for its entry into force. It was noted that several states were progressively moving towards ratification of the Convention.

3. Italy's participation in the work of IMSO.

The 50th meeting of the IMSO Advisory Committee was held in July 2024.
With regard to the Global Maritime Distress and Safety System (GDMSS), the Committee noted the changes made to the Inmarsat geostationary satellite constellation since the previous report.
The Committee's attention was drawn to the fact that, following the outages of Inmarsat's I-4 F1 fourth generation satellite in April and August 2023, IMSO visited the C-LES contingency site in Fucino, Italy, with the aim of ensuring that the lessons learned from these outages had been implemented.

With regard to the upgrade of the Safety Messaging and SafetyCast services, the Committee noted that since 12 June 2024, Iridium has been connected to fourteen Rescue Coordination Centers (RCCs).
Concerning updates to the GDMSS, the Committee advised that a voluntary online feedback system is now available via a link on the home page of the IMSO website, providing a means for seafarers, NAVAREA, METAREA, Maritime Rescue Coordination Centers (MRCCs) and member state representatives to inform the Directorate of any disruption in the provision of recognized GMDSS services.
The Committee also took note of the update on the revision of IMO Resolution A.707(17) on charges for distress, urgency and safety messages through the Inmarsat system. This issue was also considered by the Maritime Safety Committee 108, where it was agreed that MSIs should be disseminated using all recognized services by 31 December 2026 and that the Sub-Committee on Navigation, Communications and Search and Rescue (NCSR) should identify appropriate amendments to SOLAS for subsequent adoption by the IMO Assembly at its 34th session
Regarding the GDMSS Supervision Manual, the first edition is ready for use, as a tool that will help establish rules and guidelines in order to ensure consistency, fairness and uniformity in the supervision process in the context of a multi-provider environment, thus providing quality assurance.
Regarding the future of GDMSS, the benefits of L-band frequencies for the provision of satellite services in GMDSS and the congestion caused by its multiple applications were analyzed. There was also discussion about how the maritime community should prepare for potential threats in order to preserve continuity of service so as not to compromise safety at sea.
With regard to the Long Range Identification and Tracking (LRIT) system, the Committee reviewed a report on the use of the system over the past three years. In this regard, it was highlighted that the number of vessels carrying the LRIT identifier has increased to 38,850. However, LRIT continues to be underused in terms of information exchange between SOLAS contracting governments, especially in the area of search and rescue. The LRIT information provided for SAR in 2023 was 40% less than the previous year. In this regard, IMSO recently organized a training session for SAR operators in order to increase the use of LRIT for SAR. The training session was hosted online by IMSO on 27 February 2024. The event was attended by over six hundred participants from 88 countries, 61% of whom were from Rescue Coordination Centers.

The 29th IMSO Assembly met in December 2024.

To date, 110 member states have ratified the IMSO Convention. Recently, the Republic of Maldives and Tuvalu formalized their accession to the Convention.

The Director General of IMSO presented the new financial reporting system, which has improved the transparency and management sustainability of the Organization, highlighting a reduction of over 12% in the budget for 2024.

Furthermore, the Director General highlighted the under-utilization of the Long-Range Identification and Tracking (LRIT) system by Maritime Rescue Coordination Centers (MRCCs). To encourage greater adoption of the system, several initiatives were undertaken involving over 600 users from 88 countries. During the event, South Korea presented data on the use of the system, suggesting sharing an annual report with the IMO. However, some divergences emerged among member states regarding the processing of sensitive data.

In the discussion, the Italian delegation expressed its support for data sharing, considering it essential to counter the phenomenon of "ghost fleets".

With regard to the challenges arising from the proliferation of new satellite constellations, it was highlighted that in the coming years tens of thousands of satellites will orbit the Earth, creating congestion and interference in communications, risks of space collisions and an increase in space debris. These phenomena entail potential operational and financial consequences for satellite providers. The Italian delegation pointed out the importance of addressing these threats, highlighting their impact on maritime security and calling for an in-depth analysis of the problem.

Finally, the Assembly requested the Director-General to monitor technical, operational and regulatory developments related to Maritime Autonomous Surface Ships (MASS), in cooperation with the IMO.

Regarding the election of new members of the IMSO Advisory Committee, the Assembly confirmed the members currently in office for the next two years.

CONCLUSIONS.

2024 was a year of intense activity and important results for the Italian Permanent Representation to the International Maritime Organization (IMO), the International Oil Pollution Compensation Funds (IOPC FUNDS) and the International Organization for Maritime Satellite Services (IMSO), consolidating Italy's strategic role in promoting policies related to maritime safety and environmental sustainability.

Through constant commitment and qualified contribution, the Representation played a central role in supporting national interests, contributing to the global objectives of the maritime sector and strengthening international cooperation.

During 2024, the Italian Permanent Representation ensured active participation in the IMO's decision-making and negotiation processes on key issues such as: maritime safety, through the promotion of increasingly higher international standards to ensure the protection of human life at sea and the prevention of maritime accidents; the decarbonization of the sector, contributing to the definition of innovative measures to reduce greenhouse gas (GHG) emissions and accelerate the transition towards sustainable maritime transport; the digitalization of maritime transport, promoting the process of simplifying operations; the improvement of the conditions of maritime workers and their protections.

The intense activity carried out by the Permanent Representation at the aforementioned international maritime organizations has produced significant results that have highlighted the important contribution provided in the technical working groups and plenary sessions.

Looking to the future, the Permanent Representation is committed to:

- Ensuring the full implementation of maritime safety, continuing the work to implement advanced regulations and develop good practices;
- Accelerating the decarbonization of the sector by supporting initiatives aimed at achieving the IMO 2050 objectives.
- Simplifying and digitalizing maritime transport, promoting policies that favor the transition towards integrated and digital logistics.
- Protecting and raising awareness of seafarers by supporting policies aimed at making the maritime sector increasingly inclusive and safe.

This first annual report represents a significant milestone for the Italian Permanent Representation to the IMO, IOPC FUNDS and IMSO, which aims to make the intense activity carried out in these organizations more transparent, while promoting national interests in the international maritime sector in line with the principles of sustainability, efficiency and inclusiveness.

Main abbreviations

AMP = Alternative maritime power

API = Application Programming Interfaces

BDMASS = BeiDou Message Service System

CIA = Comprehensive Impact Assessment

CIS = Contribution Incentive Scheme

CII = Carbon Intensity Indicator

COMPAAZ = Comando de Operações Marítimas e Proteção da Amazônia Azul

COMSAR = Subcommittee on Radiocommunications and Search and Rescue

CTTIC = China Transport Telecommunication Information Group Co. Ltd

DMA = Distillate Marine Fuel[9]

DMZ = Distillate Marine Fuel[10]

DSC = Data collection system for fuel oil consumption of ship

EEXI = Energy Efficiency Existing Ship Index

EEDI = Energy efficiency design index

EMSA = European Maritime Safety Agency

ETS = Emission Trading System

FAL = Facilitation Committee

GHG = Greenhouse Gases

GISIS = Global Integrated Shipping Information System

GMDSS = Global Maritime Distress and Safety System

GT = Gross Tonnage

HAZMAT = Hazardous Material

HNS = Hazardous and Noxious Substances

IALA = International Association of Marine Aids to Navigation and Lighthouse Authorities

IAPH = International Association of Ports & Harbors

IGF Code = International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels,

IHO = International Hydrographic Organization

ILO = International Labour Organization

IMO = International Maritime Organization

IMCO = Inter-Governmental Maritime Consultative Organization

IMLI = International Maritime Law Institute

IMPA = International Marine Purchasing Association

IMSAS = International Maritime Organization Member state Audit Scheme

IMSSEA = International Maritime Safety Security Environment Academy

IMSO = International Mobile Satellite Organization

IPER = •Institut Portuaire d'Enseignement et de Recherche

IOPC Funds = International Oil Pollution Compensation Funds

ISPS Code = international Ship and Port Facility Security Code

ITCP = Integrated Technical Cooperation Programme

JPO = Junior Professional Officer

LDC = Least developed countries

LEG = Legal Committee

LRIT = Long-Range Identification and Tracking

MARPOL= International Convention for the Prevention of Pollution from Ships

MASE = Ministry of Environment and Energy Security

MASS = Maritime Autonomous Surface Ships

MEPC = Maritime Environment Protection Committee

MIT = Ministry of Infrastructure and Transport

MoU = Memorandum of Understanding

MRV = Measurement, Reporting, and Verification

MSC = Maritime Safety Committee

MSW = Maritime Single Windows

NAV = Subcommittee on Safety of Navigation

NCSR = Sub-Committee on Navigation, Communications and Search and Rescue

OPS = Onshore power supply

PPR = Sub-Committee on Pollution Prevention and Response

PSC = Port State Control

PSSA = Particularly Sensitive Sea Areas

RFNBO = Renewable fuels of non-biological origin

SAR = Search and Rescue

SEEMP = Ship energy efficency management plan

SIDS = Small Island Developing States

SOLAS = International Convention for the Safety of Life at Sea

SPO = Senior Professional Officer

SSE = Shore side electricity

STOPIA = Small Tanker Oil Pollution Indemnification Agreement

SUA Convention = Convention for the Suppression of Unlawful Acts against the Safety of Maritime Navigation

RoPs = Rules of Procedure

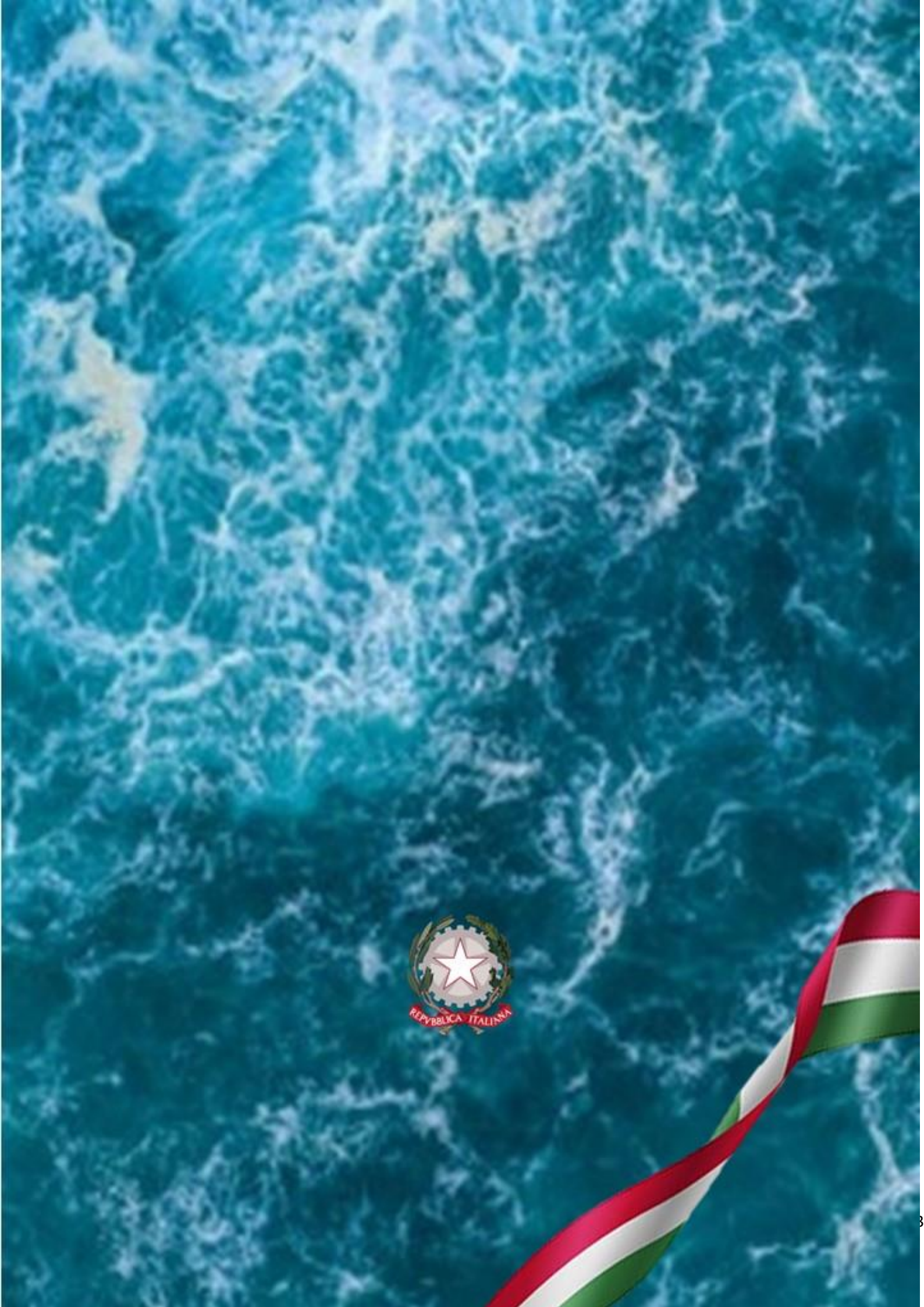
STCW = International Convention on Standards of Training, Certification and Watchkeeping for Seafarers

TOPIA = Tanker Oil Pollution Indemnification Agreement

UNCTAD = United Nations Conference on Trade and Development

WG = Working Group

WMU = World Maritime University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