

IUMI Policy Agenda

9. Plastic litter

Brief description

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

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

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

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

The PPR Sub-Committee subsequently instructed a Correspondence Group on Marine Plastic Litter from Ships to further consider the options for reducing the environmental risk associated with the maritime transport of plastic pellets and to advise the Sub-Committee

on the best way forward. The group comprised more than 150 participants from all interested sectors, including IUMI. A CG report with recommendation of a non-binding IMO circular and considerations of legal framework options was submitted to PPR for its 10th session in April 2023. On this basis the Sub-Committee agreed a draft MEPC circular on recommendations for the carriage of plastic pellets by sea in freight containers. The draft circular recommends that plastic pellets should be packed in good quality packaging which should be strong enough to withstand the shocks and loadings normally encountered during transport. Packaging should be constructed and closed to prevent any loss of contents which may be caused under normal conditions of transport. Transport information should clearly identify those freight containers containing plastic pellets. In addition, the shipper should supplement the cargo information with a special stowage request. The draft text was submitted to the Sub-Committee on Carriage of Cargoes and Containers (CCC 9, which met in September 2023) for input. CCC 9 agreed to the draft circular without proposing amendments. The Sub-Committee however shared additional information with PPR pertaining to the option of a new UN number for plastic pellets in class 9, applicable to sea mode only; main types of packaging used for plastic pellets; and further consideration of options for reducing the environmental risk associated with the maritime transport of plastic pellets.

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

Relevant authority / organizations and documents:

- **International Maritime Organization (IMO), MEPC and PPR:**
(www.imo.org/en/OurWork/Environment/Pages/Default.aspx#ave)
 - **Resolution MEPC.310(73):** Action Plan to address marine plastic litter from ships (MEPC73/19 - Annex 10), adopted 26 October 2018.
 - **MEPC75/8/3:** Report of the Correspondence Group on development of a strategy to address marine plastic litter from ships, 27 December 2019.
 - **MEPC77/8/3:** Follow-up work emanating from the action plan to address marine plastic litter from ships, submitted by Sri Lanka, 1 October 2021.
 - **PPR9/15/1:** Proposed amendments to the criteria for the identification of harmful substances in package form – Classification of plastic pellets, 26 January 2022.
 - **PPR9/15/2:** IMO guidelines on best practice related to clean-up of plastic pellets, submitted by Norway, 28 January 2022.
 - **PPR10/13:** Report of the Correspondence Group on marine plastic litter from ships, 20 January 2023.
 - **PPR10/INF.13:** Guidelines on clean-up of plastic pellets from ship-source spills, submitted by Norway, South Africa, ITOPI and IG, 17 February 2023.



- **International Pollutants Elimination Network & Centre for Environmental Justice:** X-Press Pearl – a ‘new kind of oil spill’, February 2022.

Timeline / important dates:

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

IUMI will:

- Participate in IMO Working Groups and Correspondence Groups to communicate marine insurers’ positions regard safe packaging of plastic pellets.