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Agenda item 13

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WORK PROGRAMME

Proposal to add a new output on the work programme on the suitability of IMO liability and compensation regimes with respect to alternative fuels

Submitted by Comité Maritime International (CMI)

SUMMARY

Executive summary: This document comments on document LEG 112/13/2 by reiterating CMI's support for this proposed new output, describing the work conducted by CMI on this topic thus far, and offering CMI's assistance to the Committee in completing its work.

Strategic direction, if applicable: 1, 2, and 7

Output: New output Not applicable

Action to be taken: Paragraph 7

Related document: LEG 112/13/2

Introduction

1 This document is submitted in accordance with paragraph 6.6.5 of the *Organization and method of work of the Legal Committee* (LEG.1/Circ.14) and provides comments on document LEG 112/13/2.

2 Since the Legal Committee was formed in 1967, CMI has provided support and assistance to the Committee in developing the IMO liability and compensation regime, including the International Convention on Civil Liability for Oil Pollution Damage, 1992 (CLC), Convention on Limitation of Liability for Maritime Claims, 1976, (LLMC), International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage (1971 Fund), International Convention on the Establishment of an International Fund for Compensation for Oil Pollution Damage, 1992 (1992 Fund), 2003 Supplementary Fund Protocol, International Convention on Liability and Compensation for Damage in Connection with the Carriage of Hazardous and Noxious Substances by Sea (HNS), International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001 (Bunkers Convention), etc. CMI is committed to continuing this work.

3 As a co-sponsor of document LEG 112/13/2, the CMI fully supports the proposal to add a new output to address the suitability of IMO liability and compensation regimes with respect to alternative fuels, and, if approved, CMI again stands ready to provide support and assistance to the Committee in completing its work. This document describes the work undertaken by CMI on this topic to date, and its offer to provide assistance to the Committee.

4 In July 2023, CMI established its International Working Group (IWG) on decarbonization. The IWG has three work streams on Green Fuels, Green Vessels and Green Contracts, respectively. Members of the IWG have worked ever since its establishment, both virtually and in person, including at the CMI Colloquium in Gothenburg, Sweden in May, 2024, where the IWG reports were presented, debated and subsequently published as *The Gothenburg Decarbonisation Discussion Papers*". The IWG has continued its work and will present updates during the CMI Assembly from 13 to 15 May 2025 in Tokyo, Japan. The IWG's work in all work streams is directly relevant to and supportive of the 2023 IMO Strategy on Reduction of GHG Emissions from Ships (MEPC 80/17/Add.1).

5 One of the papers contained in "*The Gothenburg Decarbonisation Discussion Papers*" relates to issues of civil liability in relation to alternative fuels (available at [Gothenburg-discussion-paper-Liability-for-Green-Fuels-1.pdf](#)), and was referenced in document LEG 112/13/2, in paragraph 6 and footnote 2. Such reports, as well as the wider work of the IWG's Green Fuels workstream are, of relevance to the proposal for a new output.

6 If the output proposed in LEG 112/13/2 is approved, then CMI proposes to support the work of the Committee, in accordance with the long-standing practice and tradition briefly set out in paragraph 2 above, as follows:

- .1 the Gothenburg Decarbonisation Discussion Papers will be formally submitted to the Committee for consideration in due course;
- .2 the continuing work of the IWG's Green Fuels work stream, and any further papers and reports produced, will be formally submitted to the Committee for consideration in due course; and
- .3 CMI will continue to advise the Committee of its work relating to the output.

Action requested of the Committee

7 The Legal Committee is invited to note the information contained in this document and comment as appropriate.