INTERNATIONAL MARITIME ORGANIZATION

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MARINE ENVIRONMENT PROTECTION COMMITTEE
85th session
Agenda item 6

MEPC 85/6/4
3 September 2026
Original: ENGLISH
Pre-session public release: ☒

ENERGY EFFICIENCY OF SHIPS

Determination of the carbon intensity indicator for bunker vessels

Submitted by IBIA

SUMMARY	
Executive summary:	Following completion of phase 1 of the review of the short-term GHG reduction measures, MEPC 83 agreed to strengthen the carbon intensity indicator (CII) requirements for ships. Despite this issue being highlighted during phase 1, and following the strengthening of the requirements, it is now virtually impossible for bunker vessels undertaking their normal operational duties to meet the C rating for CII. For the CII regulatory framework to more appropriately accommodate bunker vessels that are vital to the operation of all international shipping, and following recent amendments to regulatory instruments, it is suggested that the CII for bunker vessels should be calculated for "under way" operation only.
Strategic direction, if applicable:	3
Output:	3.2
Action to be taken:	Paragraph 12
Related documents:	MEPC 84/17, MEPC 84/6/17; MEPC 83/17, MEPC 83/17/Add.1; MEPC 82/6/9 and MEPC.1/Circ.925

Introduction

1 MEPC 83 adopted resolution MEPC.400(83) on *Amendments to the 2021 Guidelines on the operational carbon intensity reduction factors relative to reference lines (CII reduction factors guidelines, G3) (resolution MEPC.338(76))*. These amended guidelines outline the methods for determining the annual operational carbon intensity reduction factors and their values from 2023 to 2030 (indicating how much carbon intensity needs to be reduced by ships over this period), as referred to in regulation 28 of MARPOL Annex VI. The amendments adopted at MEPC 83 included newly defined CII reduction factors for 2027 to 2030.

2 MEPC 83 also agreed on a work plan for phase 2 of the review of the short-term GHG reduction measures (MEPC 83/17/Add.1, annex 5), to run from spring 2026 to spring 2028. Phase 2 aims to enhance the SEEMP framework, further develop CII metrics, and ensure synergies between the IMO carbon intensity/energy efficiency framework and the IMO Net-Zero Framework.

3 In this regard, during MEPC 83, the methodology for developing a SEEMP was further amended in the *Amendments to the 2024 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP) (resolution MEPC.395(82)),* which were adopted by resolution MEPC.401(83). These guidelines clarify that "under way" is considered to be the period between full ahead on passage (FAOP) and end of sea passage (EOSP) as per the *Guidelines for Setting up a Maritime Single Window* (FAL.5/Circ.42/Rev.3), and therefore "not under way" is the period between end of sea passage and full ahead on the following passage.

4 Subsequently, MEPC 84, in response to proposals presented in document MEPC 84/6/17 (Brazil et al.) regarding clarification of CII calculation obligations in the context of enhanced IMO DCS granularity reporting, including that distance travelled during "under way" and "not under way" periods be collected separately, adopted, by resolution MEPC.413(84), the *Amendments to the 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*.

5 The Committee also requested the Secretariat to issue a consolidated text of the guidelines, as amended, for dissemination as MEPC.1/Circ.925. Paragraph 7.6 reads as follows:

> "7.6 "Under way" is defined as the period between full ahead on passage (FAOP) and end of sea passage (EOSP) as per the *Guidelines for setting up a maritime single window* (FAL.5/Circ.42/Rev.3). "Full ahead on passage" is more commonly referred to in performance monitoring systems as "begin of sea passage", which is also defined in the IMO Compendium on facilitation and electronic business (IMO Compendium) under IMO 0597 (Code EV10). "Not under way" is therefore the period between end of sea passage and full ahead on passage. Note that canal passage, that is, the period between begin canal passage (EV08) and end canal passage (EV09) which are also defined in the IMO Compendium under IMO 0597 should be considered not under way due to frequent manoeuvring, acceleration and deceleration."

6 Previously, MEPC 81 adopted, by resolution MEPC.385(81), amendments to appendix IX of MARPOL Annex VI on the information to be submitted to the IMO Ship Fuel Oil Consumption Database (regulation 27), to include a requirement for the ship to collect and report data on "fuel oil consumption while the ship is not under way by fuel oil type".

Compliance with the CII requirements by conventional bunker vessels

7 Evidence presented by the shipping industry identified the challenges for ships across the international fleet to comply with the current CII requirements, resulting in a detailed discussion being held at MEPC 81. During that discussion, some delegations expressed their expectation that the CII review process would result in a fairer system but also cautioned that, if left unaddressed, this situation would be likely to lead to unintended consequences for the decarbonization process and penalize ships for factors that were beyond their control, for example due to short voyages and extended port waiting time (MEPC 81/16, paragraph 6.19).

8 MEPC 81 had noted the concerns expressed regarding the shortcomings and unintended consequences of the CII mechanism and the general agreement that these concerns should be fully considered and addressed during the CII review process (MEPC 81/16, paragraph 6.23.2).

9 MEPC 82/6/9 (IBIA) identified that bunker vessels are, and always will be, constrained by the vital operational duty they undertake for international shipping that consists primarily of short voyages and in-port manoeuvring. Consideration was therefore requested for an amendment to the CII Guidelines, G5, with the inclusion, as with other ship types, of a specific correction factor for bunker vessels based on analyses set out in documents ISWG-GHG 8/3/1 (Greece) and MEPC 81/INF.28. As with other proposals for correction factors submitted under phase 1 of the review of the short-term GHG reduction measures, MEPC 83 decided to defer further consideration to phase 2 (MEPC 83/17, paragraph 6.27, and MEPC 83/17/Add.1, annex 5).

10 The series of amendments made to the SEEMP Guidelines and to appendix IX of MARPOL Annex VI as identified above in paragraphs 3 to 6 require the distance travelled and hours to be recorded both when the ship is "under way" and when "not under way", along with "fuel oil consumption" for each of these distinct parts of the ship's operation respectively. As a consequence, it is now possible to calculate the CII for bunker vessels using data for both "distance travelled" and "fuel oil consumption" when the ship is "under way" only.

Proposal

11 To appropriately and meaningfully reflect the vital operational duties of bunker vessels, IBIA requests the Committee to consider that the calculation of CII for a conventional bunker vessel should be when that vessel is "under way" only.

Action requested of the Committee

12 The Committee is invited to consider the comments in paragraphs 7 to 10 above, the proposal in paragraph 11 suggesting that the calculation of CII for a conventional bunker vessel should be when that vessel is "under way" only, and to take action as appropriate.