



MARINE ENVIRONMENT PROTECTION
COMMITTEE
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ENERGY EFFICIENCY OF SHIPS

ICS CII data collection – summary of 2024 results

Submitted by ICS

SUMMARY

Executive summary: Initially launched in October 2023, the ICS CII Data Collection System has been set up to support the Committee's review of the Carbon Intensity Indicator (CII) rating system. The collected data enables a better understanding of how effectively the CII regulations are performing. Responders can elect to share their data in anonymized form with IMO, and with trade associations. This document summarizes the key findings for the 2024 reporting period. The key findings for the 2023 reporting period were previously submitted as document MEPC 82/6/10 (ICS).

*Strategic direction,
if applicable:* 3

Output: 3.2

Action to be taken: Paragraph 17

Related documents: MEPC 80/17/Add.1; MEPC 82/6/10, MEPC 82/6/38;
MEPC 83/17/Add.1 and MEPC 84/6/1

Introduction

1 Regulations 25 and 28 of MARPOL Annex VI confirmed that a review of the short-term measures (including the CII regulations) should be carried out, and this must be completed by 1 January 2026.

2 MEPC 80 approved a review plan of the short-term GHG reduction measures (MEPC 80/17/Add.1, annex 13), with the following invitation therein:

"Interested Member States and international organizations are invited to collect data and submit information and proposals to the relevant MEPC meetings during the data gathering stage.

Additionally, other stakeholders (e.g. shipowners, charterers, manufacturers, ports authorities, etc.) are invited to provide data to facilitate the review process, through the designated email address: ghg@imo.org"

3 The voluntary ICS CII Data Collection System was launched on 9 October 2023, and has been set up in response to the Committee's invitation. The objective of the ICS system is to support the CII review process.

4 At MEPC 83, the Committee having noted the outcome of the Working Group on Air Pollution and Energy Efficiency, approved the *Work plan for phase 2 of the review of the short-term GHG reduction measure*, including CII, extending to spring 2028 (MEPC 83/17/Add.1, annex 5).

5 Therefore, noting the extended timeline for the CII review, the ICS data collected for the 2024 reporting period continues to have relevance to the review and is therefore summarized within this document.

Key findings

6 A total of 212 submissions of 2024 data were received. For comparison, ICS's previous submission¹ of 2023 data was based on 200 sets of data.

7 The key findings from the 2024 data are as follows:

- .1 132 submissions were received from bulk carriers, 38 from tankers, 23 from container ships, and 19 from ro-ro cargo ships;
- .2 for 56% of submissions, the fuel oil consumption was determined from bunker delivery notes, about 22% from tank monitoring, and 21% from flow meters. This represents a significant increase in the use of flow meters as compared to 2023 (previously 4%); and
- .3 the breakdown of confirmed ratings is shown in table 1 and suggests an improvement relative to 2023.

Table 1: Validated 2024 and 2023 CII ratings by percentage (ICS data)

CII rating	Percentage of ships for 2024	Percentage of ships for 2023
A	14%	7%
B	17%	13%
C	35%	26%
D	31%	37%
E	4%	17%

8 However, for comparison IMO's annual fuel oil consumption reports for 2023² and 2024³ include breakdowns of CII ratings for the world fleet, and are reproduced in table 2 below. This data shows little annual improvement in the ratings.

Table 2: Validated 2024 and 2023 CII ratings by percentage (IMO data)

¹ Document MEPC 82/6/10 (ICS) - ICS CII data collection – summary results.

² Document MEPC 82/6/38 (Secretariat) - Report of fuel oil consumption data submitted to the IMO Ship Fuel Oil Consumption Database in GISIS (Reporting year: 2023).

³ Document MEPC 84/6/1 (Secretariat) - Report of fuel oil consumption data submitted to the IMO Ship Fuel Oil Consumption Database in GISIS (Reporting year: 2024).

CII rating	Percentage of ships for 2024	Percentage of ships for 2023
A	19.7%	19.3%
B	21.4%	21.1%
C	29.4%	26.6%
D	15.2%	13.7%
E	5.5%	5.4%
Not reported	8.9%	13.9%

9 For those shipowners/managers who felt their ratings unfairly reflected the ship's efficiency, the reasons cited were as follows:

Table 3: Reasons cited for perceived unfair ratings (ICS Data)

Reasons for perceived unfair ratings	Number of responses citing this reason
Short voyages	28
Port waiting time	38
High percentage of laden voyages	22
Uncompensated fuel consumption relating to cargo handling ,or cargo maintenance	2

10 Shipowners suggested the following CII system improvements:

Table 4: Suggested CII system improvements (ICS Data)

Potential system improvements	Number of responses proposing this improvement
Exclude waiting time over 15 days	18
Exclude bad weather from BF7 and above	18
Calculate CII on basis of actual transport work	1

Discussion

11 Submission of data to the ICS CII Data Collection System is voluntary, and consequently the sample size is relatively small. Hence the rating trends within table 1 must be considered less accurate than the trends within the IMO data, which is included in table 2.

12 Nevertheless, the ICS system includes data fields that enable shipowners to identify perceived system weaknesses and propose system improvements. Indeed, it is reasonable to assume that it is particularly those that have experienced CII system inaccuracies that have been motivated to voluntarily submit data. In this respect, the ICS data has relevance to the ongoing CII review, as it can highlight areas of concern and opportunities for improvement.

13 The 2024 data has again underlined the concerns over short voyages and port waiting time. In this respect the proposals to MEPC 82⁴ and ISWG-APEE 1⁵ to refocus CII towards the

⁴ Document MEPC 82/6/31 (Brazil et al.) - Proposal for the revised CII reference lines excluding ships' emissions at idle periods.

⁵ Document ISWG-APEE 1/2/8 (RINA) - Revised CII metric.

fuel used during the sea passage show great promise, and could lead to significant improvements.

14 The impact of adverse weather on fuel consumption and CII rating remains an area for improvement. Indeed, the greatest impact will be experienced during the sea passage, not in port or at anchor. Therefore, the aforementioned proposals to refocus CII on the sea passage will not address this system anomaly.

15 Use of maximum deadweight as a proxy for cargo capacity within Annual Efficiency Ratio (AER) and cgDIST continues to reward ballast legs over cargo carrying. Even if the proposed refocusing on the sea passage were to be adopted, this perverse incentive would still apply.

16 If CII is to emerge as a consistently accurate measure of efficiency it remains important for the Committee to separately address the system weaknesses relating to adverse weather, and the use of maximum deadweight as a proxy.

Action requested of the Committee

17 The Committee is invited to consider the information provided in this document, take note of the system weaknesses identified in paragraphs 13 to 16 and ensure adequate time and resource is allocated within the CII review to fully resolve all such anomalies.

ANNEX

GRAPHICAL PRESENTATION OF THE KEY FINDINGS FROM THE ICS CII DATA COLLECTION SYSTEM

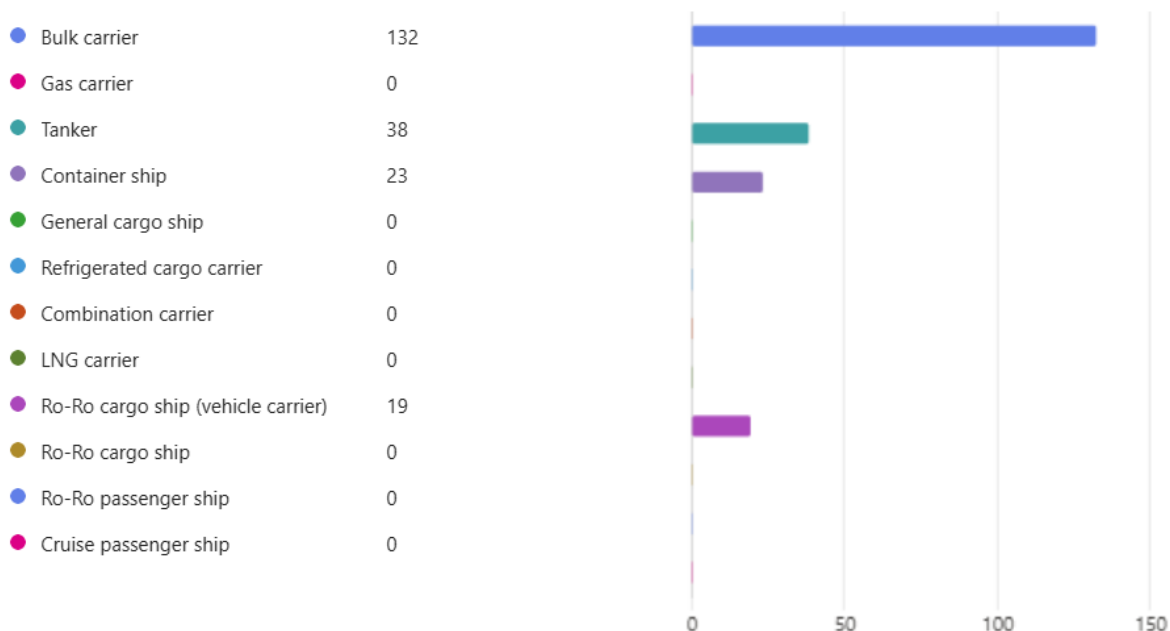


Figure 1: Number of submissions by ship type

Bunker delivery note (BDN)	183
Flow meters	69
Bunker FO tank monitoring	73
LNG cargo tank monitoring	0
Cargo tank monitoring, other than LNG	0

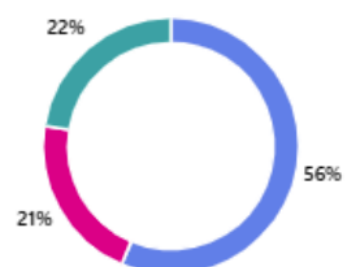


Figure 2: Number of ships adopting the various methods for collecting fuel oil consumption data



Figure 3: The number of ships with confirmed CII ratings A,B,C,D,E

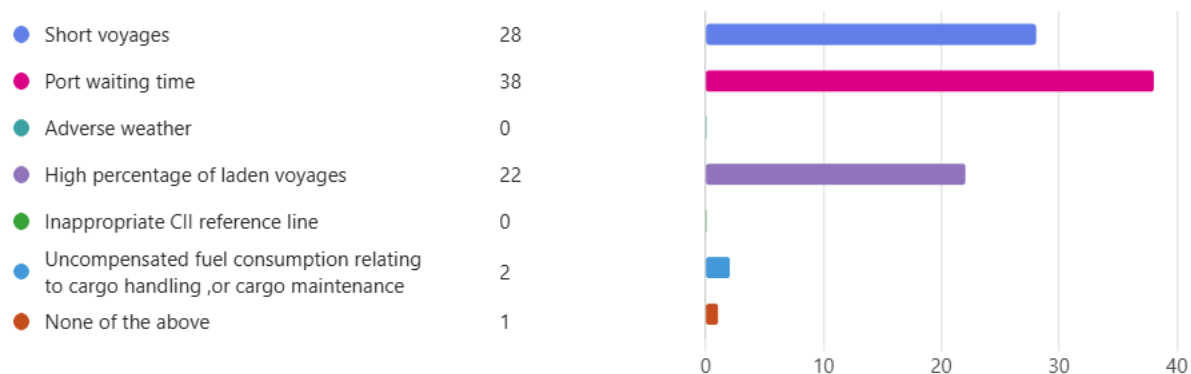


Figure 4: The reasons cited for perceived unfair CII ratings, by number of ships

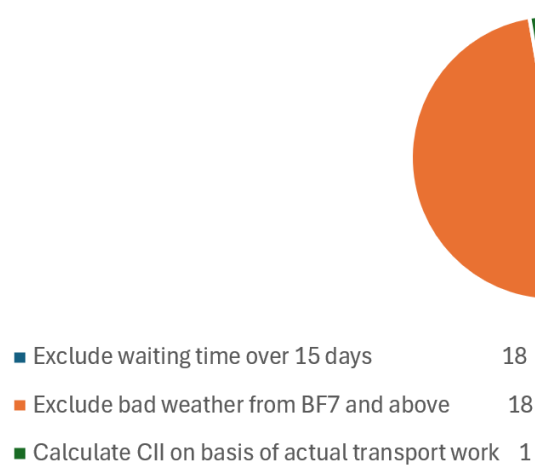


Figure 5: Suggested CII system improvements, by number of ships