



MARINE ENVIRONMENT PROTECTION
COMMITTEE
84th session
Agenda item 6

MEPC 84/6/8
12 February 2026
Original: ENGLISH
Pre-session public release: ☒

ENERGY EFFICIENCY OF SHIPS

Impact assessment of the BWM Convention on IMO's decarbonization frameworks

Submitted by ICS, INTERTANKO and INTERCARGO

SUMMARY

<i>Executive summary:</i>	The Committee is invited to examine how the BWM Convention impacts IMO's carbon intensity/energy efficiency and the IMO Net-Zero (the energy intensity-based approach) frameworks.
<i>Strategic direction, if applicable:</i>	3
<i>Output:</i>	3.2
<i>Action to be taken:</i>	Paragraph 10
<i>Related documents:</i>	MEPC 83/4/8, MEPC 83/INF.21, MEPC 83/WP.12 and MEPC 83/17

Introduction

1 The Ballast Water Review Group (BWRG), at MEPC 83, discussed documents MEPC 83/4/8 (India et al.) and MEPC 83/INF.21 (INTERTANKO) on the emission impact of actions taken following a ballast water management system (BWMS) bypass. The Group noted that this issue links to MARPOL Annex VI and the review of the carbon intensity indicator (CII), thus exceeding the BWRG's scope and requiring consideration under agenda item 6.

2 The Committee noted the BWRG's discussions (MEPC 83/WP.12, paragraphs 63 and 64) concerning the impact on ship emissions from actions taken after a BWMS bypass. The Committee noted that any interested Member States and international organizations could submit data and proposals relating to this matter to a future session under agenda item 6 on energy efficiency of ships (MEPC 83/17, paragraph 4.26).

3 While the Committee had approved the work plan for phase 2 of the review of the short-term GHG reduction measures, as set out in annex 5 of document MEPC 83/17/Add.1, this does not prevent any Member State or international organization from submitting additional proposals during phase 2.

Discussions

4 Document MEPC 83/4/8 highlighted that operational measures taken by ships after a legitimate BWMS bypass to manage discharge risks could result in an increase in the affected ships' operational CII, as defined by MARPOL Annex VI. This potential rise in the CII could lead to the ship receiving a D or E rating, which would negatively impact its certificates and Statement of Compliance related to fuel oil consumption reporting and operational carbon intensity rating.

5 An analysis of 48 voyages conducted by 27 INTERTANKO member ships following a BWMS bypass suggests that subsequent operational measures increase ship emissions. The measures implemented resulted in an average 9% increase in CO₂ emissions and an average 6.4% increase in the CII per voyage. The document concluded that a more detailed analysis was required to precisely determine the impact on a ship's average CII.

6 Given the ongoing discussion on the CII rating, the possible increase in emissions from necessary operational measures (e.g. additional steaming/deviation for ballast water exchange, and the pumping of the ballast water) may be categorized as "under way" fuel consumption. Therefore, it is necessary to verify the impact on the attained CII level. If the additional fuel consumption and corresponding distance (from BWMS bypass measures) are excluded from the CII calculation, the final rating may be affected differently than currently anticipated.

7 The co-sponsors acknowledged views expressed in the BWRG that future analysis should include all ship types to provide a complete understanding of the potential issue. Based on this, the co-sponsors plan to conduct further analysis and submit the results at a future MEPC session.

8 Following the discussion, the co-sponsors recognize the need to consider the synergy between the Ballast Water Management (BWM) Convention and IMO's carbon intensity/energy efficiency framework and its IMO Net-Zero Framework (the energy intensity-based approach).

Proposals

9 The Committee is invited to:

- .1 note the co-sponsors' intention to conduct further analysis on this issue and submit the results at a future MEPC session;
- .2 consider requesting the Working Group on Air Pollution and Energy Efficiency to examine the impact of the BWM Convention on IMO's carbon intensity/energy efficiency framework; and
- .3 consider requesting the Working Group on Reduction of GHG emissions from ships to examine the impact of the BWM Convention on the IMO Net-Zero Framework (the energy intensity-based approach).

Action requested of the Committee

10 The Committee is invited to consider the proposals in paragraph 9, taking into account discussions detailed in paragraphs 4 to 8 of this document, and take action as appropriate.