



MARINE ENVIRONMENT PROTECTION
COMMITTEE
85th session
Agenda item 6

MEPC 85/6/3
28 August 2026
Original: ENGLISH
Pre-session public release: ☒

ENERGY EFFICIENCY OF SHIPS

Implementation of the CII within the French fleet

Submitted by ICS

SUMMARY

Executive summary: This document presents findings from a 2026 survey of French shipowners on the carbon intensity indicator (CII). Based on responses from 18 companies operating 153 ships, the study found generally high compliance with CII requirements but identified significant flaws in the system. Key concerns include the treatment of inactivity periods, short voyages, adverse weather, cargo handling, and incentives that may distort operational behaviour. Evidence shows that severe weather can increase fuel consumption by up to 25%, unfairly affecting CII ratings. The document urges IMO to address all system anomalies and prioritize streamlining procedures over increased levels of administration.

*Strategic direction,
if applicable:* 3

Output: 3.2

Action to be taken: Paragraph 14

Related documents: MEPC 76/7/43; MEPC 77/7/14; MEPC 78/7/22; MEPC 79/7/13, MEPC 79/7/21, MEPC 79/INF.19; MEPC 80/6/3; MEPC 82/6/2, MEPC 82/6/7, MEPC 82/6/9, MEPC 82/6/10, MEPC 82/6/11, MEPC 82/6/27, MEPC 82/6/28, MEPC 82/6/31, MEPC 82/6/34, MEPC 82/6/35, MEPC 82/INF.26, MEPC 82/INF.38, MEPC 82/INF.39, MEPC 82/INF.45; MEPC 83/17/Add.1; MEPC 84/6/5, MEPC 84/6/13; ISWG-GHG 12/2/1, ISWG-GHG 12/2/2, ISWG-GHG 12/2/3, ISWG-GHG 12/2/4, ISWG-GHG-12/2/5, ISWG-GHG 12/2/6 and ISWG-GHG 12/2/7

Introduction

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

2 MEPC 80 approved the review plan of the short-term GHG reduction measure (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 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).

4 Accordingly, in February 2026, Armateurs de France conducted a survey of its members' operational experience with CII. Eighteen companies operating 153 ships of 5,000 GT and above participated. The results of the survey are presented in the annex to this document.

Armateurs de France

5 Armateurs de France is the trade association for French shipowners and a member association of ICS. It represents around 60 member companies operating in cargo shipping, passenger transport, offshore activities, marine rescue, port services, oceanographic research, submarine cable installation and other maritime sectors.

Key outcomes of the study

6 Whilst the study reports a high level of CII compliance, a number of system anomalies are identified. If these are left unaddressed, they will, in conjunction with the annual increases in the Z reduction factor, impact CII ratings going forward to the point where ships are unfairly deemed to be non-compliant.

7 Many of these issues have been highlighted in earlier submissions, and remedies for most are under discussion within MEPC. Nevertheless, such operational feedback from shipowners is an important viewpoint, and ICS hopes this study can further emphasize the importance of addressing all system anomalies.

8 The study highlights that certain routes serving remote and insular regions may face operational and infrastructure constraints which are not adequately reflected in the current CII framework. These may include longer port stays, limited port infrastructure, adverse weather, restricted route flexibility and unavoidable operational patterns. Such factors can negatively affect CII ratings without necessarily reflecting lower ship efficiency. The review should therefore continue to consider how the CII framework can better account for these specific operating conditions, thereby leading to a fairer and more accurate rating mechanism.

9 The highlighted anomalies are summarized in table 1, together with references to previous submissions that have identified the same issues:

Table 1: CII anomalies highlighted by the study

Study page number	Anomaly	Previous MEPC submissions highlighting the same issues
3	Periods of inactivity	ISWG-GHG 12/2/1, ISWG-GHG 12/2/2, ISWG-GHG 12/2/3, ISWG-GHG 12/2/7, MEPC 78/7/22, MEPC 79/7/13, MEPC 79/7/21, MEPC 79/INF.19, MEPC 82/INF.38, MEPC 82/INF.39, MEPC 82/INF.45, MEPC 82/6/2, MEPC 82/6/7, MEPC 82/6/9, MEPC 82-6-10, MEPC 82/6/11, MEPC 82/6/27, MEPC 82/6/28, MEPC 82/6/31, MEPC 82/6/35, MEPC 82/INF.26 and MEPC 84/6/13
3	Short voyages	ISWG-GHG 12/2/3, ISWG-GHG 12/2/6, MEPC 79/7/13, MEPC 82/6/2, MEPC 82/6/10 and MEPC 84/6/13
3, 5	Adverse weather	ISWG-GHG 12/2/2, ISWG-GHG 12/2/3, ISWG-GHG 12/2/4, MEPC 82/6/10, MEPC 84/6/5 and MEPC 84/6/13
3	Cargo handling	MEPC 76/7/43, ISWG-GHG 12/2/3, ISWG-GHG 12/2/5, MEPC 80/6/3 and MEPC 82/6/34
3, 4	Perverse incentives to maximize distance travelled and minimize cargo carried	MEPC 77/7/14, MEPC 82/6/10 and MEPC 84/6/13
7	High administrative burden on shipowners	

Adverse weather

10 The Armateurs de France study includes data for the years 2020 to 2025 that demonstrates the seasonal impact of adverse weather on fuel consumption of a ro-ro ship operating in the Bay of Biscay. Relative to the ship's yearly average, increases in fuel consumption of up to 25% are recorded for the winter versus reductions of just 8% for the summer. This shows a very similar pattern to the seasonal variation in fuel consumption that was presented in document MEPC 84/6/5 (Cook Islands et al.). For comparison, both sets of data are presented in figures 1 and 2 below. This further demonstrates the very significant impact of adverse weather on fuel consumption and thereby the CII ratings. This impact is currently unaddressed within the CII rating system and represents a significant system inaccuracy, particularly for ships that are constrained to operate on regular routes that are subject to above-average frequency and severity of adverse weather.

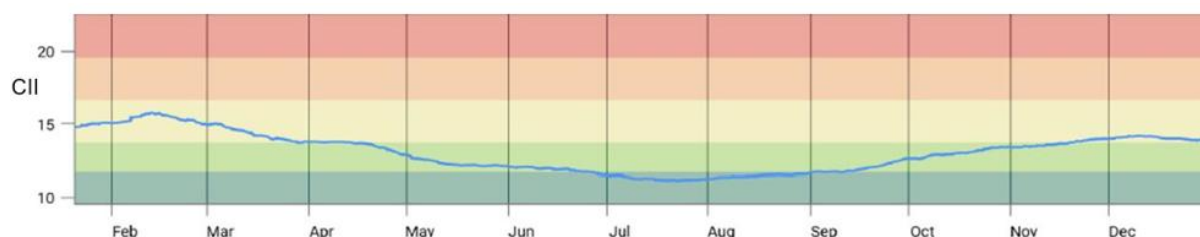


Figure 1: Seasonal variation of CII noted for a Faroe Isles-based ro-ro – document MEPC 84/6/5 – Smyril Line

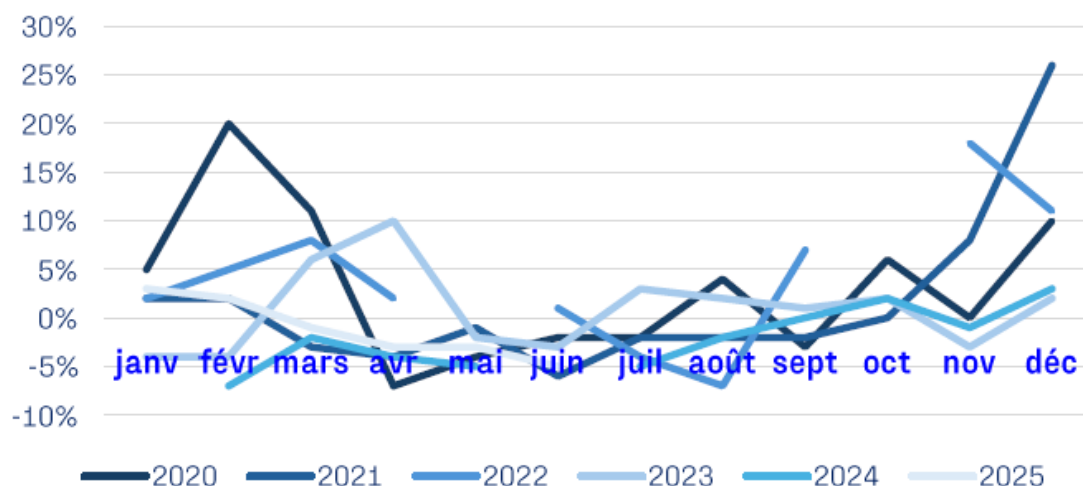


Figure 2: Seasonal variation of fuel consumption for a ro-ro operating in the Bay of Biscay – Armateurs de France

Discussion

11 Most of the anomalies highlighted by the Armateurs de France study have already been the subject of multiple submissions to MEPC, and potential remedies are already under discussion. This operational experience is further validation of the importance of addressing all such system inaccuracies.

12 For ships constrained to operate on regular routes within harsh metocean regions, figures 1 and 2 above further demonstrate the seasonal impact of adverse weather on fuel consumption and CII ratings. The winter increases are not an indicator of reduced efficiency, but simply the impact of the location of the route being served. It is very important to address this system anomaly, otherwise, with the annual increases in the Z factor, there may be routes in the high latitudes where, through no fault of their own, it becomes infeasible for ships to comply with the CII requirements.

13 Within the system improvements under consideration, it is also important to recognize that shipowners are experiencing a significant administrative burden, both in the reporting of data and in the submission and approval processes for corrective action plans. Therefore, the streamlining and harmonization of procedures, reporting formats, and verification practices should be prioritized over any further increase in administrative requirements.

Action requested of the Committee

14 The Committee is invited to consider the information provided in this document, forward it to the Working Group on Air Pollution and Energy Efficiency, and address the concerns expressed within paragraphs 11 to 13.

ANNEX

RESULTS OF THE ARMATEURS DE FRANCE SURVEY ON OPERATIONAL EXPERIENCE WITH CII



KEY FIGURES

95%

Ships operated by French companies comply with the CII targets in 2025 (out of 153 vessels operated by 18 French shipping companies, excluding CMA CGM). 5% of the fleet considered are rated E and must therefore submit a corrective action plan within the year to maintain compliance.

2/3

French shipping companies consider the CII reduction targets for 2030 to be unachievable or difficult to achieve. Several issues have been identified, which particularly penalize certain vessels or operations (cruise activities, ballast voyages, weather constraints, etc.).

X4

Ships operated by French companies would be rated E by 2030 under the CII if significant corrective measures are not implemented (it represents 20% of the fleet considered). RoPax vessels and cruise ships are the most exposed.

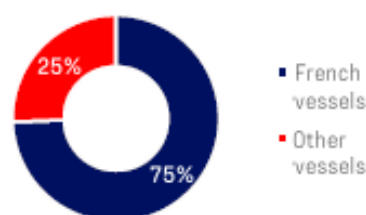
SCOPE & METHODOLOGY

Armateurs de France conducted a survey in February 2026 among all its members operating vessels subject to the Carbon Intensity Indicator (CII) requirements. **18 companies operating 153 transport vessels** (cargo and passenger) of 5,000 GT and above took part (excluding the CMA CGM fleet). Three-quarters of the fleet considered is operated under the French flag.

Respondents were invited to answer four questions relating to:

1. The **CII rating** of their vessels in 2025 (French and foreign)
2. Their **assessment of the reduction factors** up to 2030
3. Their **assessment of the correction factors** and shortcomings of the CII
4. Their **feedback on administrative and procedural aspects**

Vessel flag (CII survey)



CII: WHAT IS IT ABOUT?

The CII is based on an annual reduction factor designed to ensure the **continuous improvement of a ship's operational carbon intensity**. The actual annual operational CII achieved is assessed and compared to a required annual operational CII. This process determines the ship's CII rating across five grades: A, B, C, D, or E (with A being the best).

The rating reflects a level of performance: major superior, minor superior, moderate, minor inferior, or inferior. The performance level is recorded in a "Statement of Compliance" detailed in the Ship Energy Efficiency Management Plan (SEEMP).

A ship rated D for three consecutive years, or E for one year, must submit a corrective action plan demonstrating how it will achieve the required CII rating of C or above.

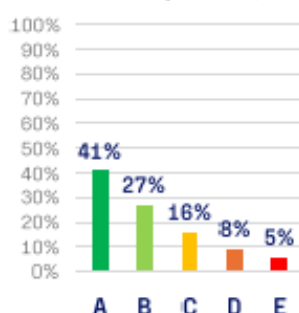




CII RATINGS IN 2025

In 2025, the CII rating of the fleet under French control is overall excellent, with only 5% of the vessels considered rated E and therefore required to submit a corrective action plan within the year to maintain compliance. Ratings are gradually distributed, with a significant share of A ratings (40%), extending down to D.

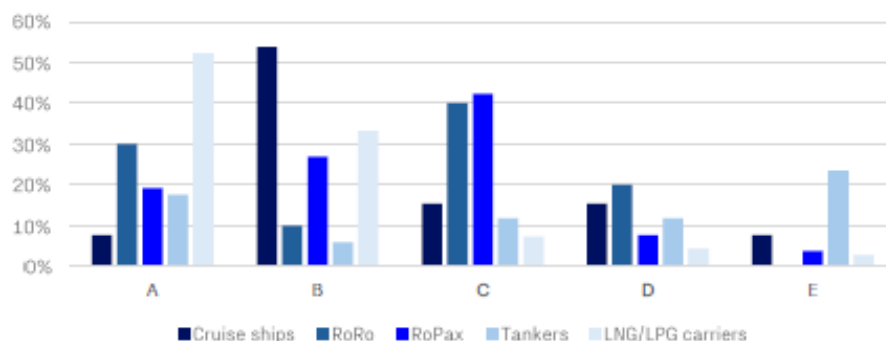
2025 (fleet operated by french shipowners)



This distribution is not uniform across the main fleet segments:

- **RoPax vessels** (only 8% rated D and 4% rated E) and **LNG/LPG carriers** (only 4% rated D and 3% rated E) have the best ratings.
- While no **RoRo** vessels are rated E, 20% of this segment is rated D, with a risk of rapid deterioration in ratings in the coming years due to penalizing factors (short voyages, ballast voyages, weather constraints).
- Some fleet segments experience degraded ratings due to specific characteristics that are poorly accounted for in the CII (**cruise ships**) or due to vessel age (**tankers**).

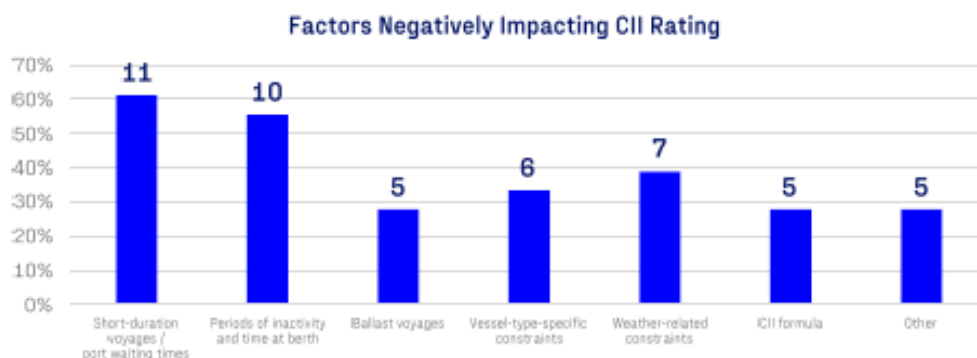
CII 2025 per ship type



CII RATING DEPRECIATION FACTORS

All vessels are affected by fundamental shortcomings of the CII, to varying degrees depending on the type of ship or activity, particularly in relation to distance travelled and periods of inactivity.

The main difficulties reported by shipowners who contributed to the study concern the treatment of **short voyages** (61% of companies) and **periods of inactivity or time spent at berth** (56%). Many other issues are also identified: ballast voyages, weather constraints, and constraints related to certain types of vessels equipped with cranes or dedicated to cruise activities.



In many cases, the CII incentivizes vessels to increase the distance they travel, sometimes leading to counterproductive decisions. It is essential that correction factors, necessary for the proper implementation of the instrument and not accounted for during its initial design, be developed during Phase 2 of the CII review (2026–2028). Additionally, voyage exclusions should be introduced for periods when the vessel is inactive due to its operations (port calls, anchorage, technical stops, including dry dock, etc.).



Focus : Cruise ships

The analysis nevertheless indicates that while the cgHRS metric appears better suited than cgDIST to the vast majority of the cruise fleet, the current reference lines and rating boundaries may not fully address specific segments, due to their peculiar operational profile.

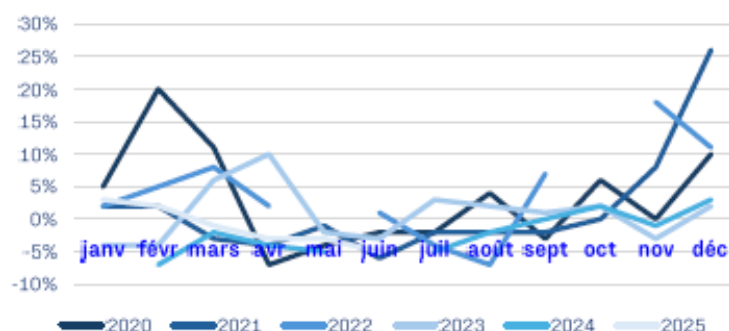
For those segments, in the Experience Building Phase, the use of both cgHRS and cgDIST could be allowed for comparison purposes.



Focus : Adverse weather conditions

A member of Armateurs de France assessed the increase or decrease in the fuel consumption of one of its vessels operating in the Bay of Biscay, expressed as a percentage relative to an average value calculated from the mean consumption over a six-year period (2020–2025).

**Augmentation/réduction de la consommation annuelle
moyenne d'un navire opéré dans le golfe de Gascogne
(2020-2025)**



Vessel characteristics:

- Length (LOA): 155 m
- Type: Ro-Ro
- Year of construction: 1999
- Tonnage: 12,000 GT

Positive values represent overconsumption compared to this average, while negative values indicate reduced consumption. Speeds were filtered by removing values that were too high or too low in order to avoid biasing the results. The analysis therefore focuses on a speed range between 13 and 16.5 knots, representative of the vessel's normal commercial operations.

It is clearly observed that between October and February, during winter—when weather conditions are most severe—consumption levels are often significantly higher than the annual average. Conversely, between May and August/September, they are much more frequently below this average value. These factors heavily penalize the CII rating without reflecting the vessel's actual efficiency.

A proposal to include adverse weather conditions in the CII calculation, through a dedicated correction factor as suggested by several IMO Member States and industry organizations at MEPC 84¹, is a sound solution.

However, the question of supporting evidence will arise: will the captain's daily reports (noon reports) be sufficient? Should onboard sensors with automated recording be used? Or voyage histories incorporating satellite-based data on relevant weather conditions? Could a coefficient based on sea state be included? The method of verification will need to be sufficiently robust to prevent misuse, ensure legal certainty for operators, and limit the administrative burden on crews. In case of doubt, a second weather assessment from another provider chosen by the verifier could be relevant.

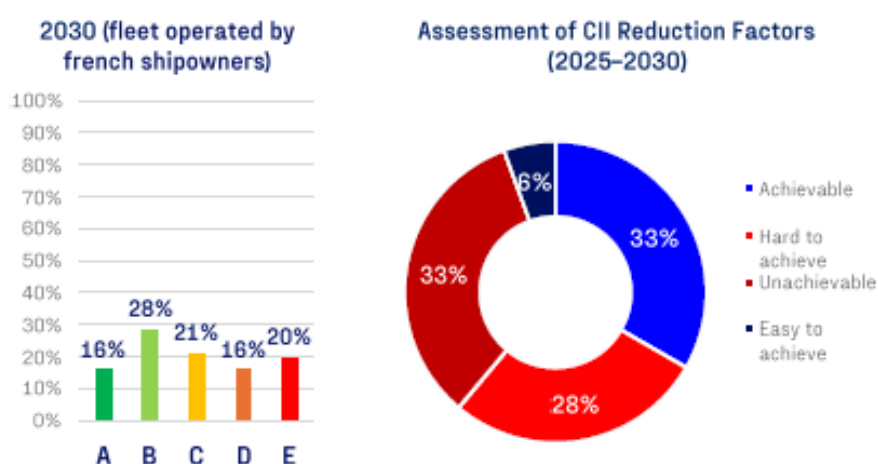
¹ Submission MEPC 84/8/6 (Cook Islands, India, Malaysia, Panama, United Arab Emirates, ICS, IPTA, WSC)



CII 2030 AMBITION

Armateurs de France surveyed the contributing companies on their assessment of the CII reduction factors for 2025–2030 and on their projected ratings for their fleets by 2030. **Two-thirds of shipowners consider the CII ambitions over this period to be unachievable or difficult to achieve.**

Without significant adjustments to the instrument or substantial incorporation of biofuels, the proportion of vessels rated E would be multiplied by four between 2025 and 2030, with **20% of the fleet becoming non-compliant**.



All fleet segments experience this deterioration in their ratings to varying degrees: cruise ships would be heavily impacted (with 80% of the fleet rated D or E by 2030), as would RoPax vessels (with 40% of the fleet rated D or E by 2030). The least affected segment remains, as in 2025, LNG and LPG carriers (with "only" 13% of vessels rated E).





PROCEDURAL & ADMINISTRATIVE ASPECTS

Shipowners' feedback on the CII verification process and the management of corrective action plans points to an overall assessment of complexity, heterogeneity, and administrative burden, despite some positive aspects.

First, **the procedure for submitting and approving corrective action plans is considered particularly burdensome**, especially during the initial implementation phase, with multiple layers of validation (e.g. CCS). Shipowners question whether human resources—both within companies, classification societies, and administrations—will be able to handle a potential increase in such procedures. This administrative burden is further exacerbated by the lack of harmonization between reporting tools and regulations (IMO DCS, MRV, FuelEU, ETS).

Classification societies (verifiers) play a central role in the process. Processing times are sometimes considered too long by shipowners. The tools provided are uneven: some platforms are user-friendly and well-integrated, while others require manual reprocessing or suffer from bugs. The lack of standardization in data formats and reporting templates is a major issue, particularly for shipowners working with multiple classification societies. Inconsistencies in data processing or reporting are also reported, along with a lack of transparency in calculations. Finally, the inability to freely choose one's verifier (as it is linked to the vessel's classification society) can result in duplicate verification processes and additional workload.

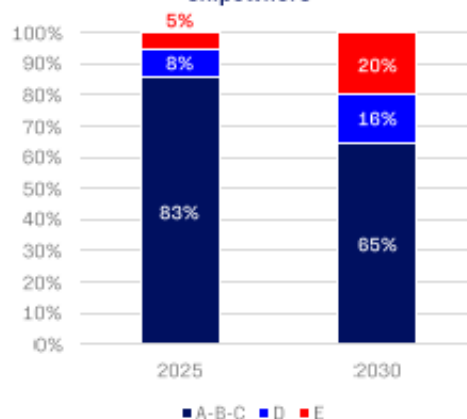
On the other hand, **feedback regarding administrations (flag States) is generally positive.** They are perceived as accessible, pragmatic, and attentive to operational constraints, particularly during the submission of corrective action plans. Exchanges are considered constructive, even if certain decisions (e.g. refusal of reporting exemptions) may sometimes appear rigid.

CONCLUSION

Many criticisms concern the CII methodology itself. The direct link between fuel consumption and distance travelled creates significant biases, leading to situations perceived as unfair or inconsistent. The framework is sometimes seen as insufficiently incentive-based, or even ineffective in the absence of clear enforcement measures.

While the compliance process is generally operational, shipowners call for greater harmonization of procedures, standardization of tools, and administrative simplification, to improve data reliability, reduce workload, and enhance the overall consistency of the system.

CII of the fleet operated by french shipowners





Among the areas for improvement identified for the CII, Armateurs de France supports:

- The **introduction of a pooling mechanism or fleet-level CII**, allowing lower ratings to be offset by better-performing vessels, thereby concentrating investment on newer ships that are intended to remain in service longer.
- The **implementation of sufficient, consistent, and effective controls by flag States**, to avoid potential distortions of competition.
- The **rapid adoption of correction factors for certain vessels and specific operational constraints** (weather conditions, ballast voyages, etc.).
- The **exclusion of certain operational periods** during which the vessel is not using its propulsion, for example when it is stationary (port calls, anchorage, technical stops, including dry dock, etc.).

It is essential to introduce several critical adjustments to the CII to prevent unjustified deterioration in ratings that cannot be attributed to companies, particularly as they are making significant investments in decarbonizing their fleets and improving vessel energy efficiency.

Contact :

Pierre-Antoine Rochas, Director of Environment, Safety, Security, Ports & Datas
pa-rochas@armateursdefrance.org