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ENERGY EFFICIENCY OF SHIPS

CII reference line adjustments to focus on ships' fuel consumption while under way

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SUMMARY

Executive summary: This document proposes that the Committee utilize the enhanced granularity of data from the IMO Data Collection System (DCS) to reassess and recalibrate the carbon intensity indicator (CII) reference lines by focusing on fuel consumption while ships are under way. This document further proposes a distributional analysis of the impact on attained CII values by ship type and size segment and on CII ratings, and consideration of whether existing correction factors and voyage adjustments should be incorporated into the revised framework.

*Strategic direction,
if applicable:* 3

Output: 3.2

Action to be taken: Paragraph 17

Related documents: Resolutions MEPC.355(78), MEPC.366(79), MEPC.385(81) and MEPC.401(83); MEPC 82/6/31; MEPC 83/17/Add.1, MEPC 83/WP.10; MEPC 85/6/4 and ISWG-APEE 1/2/5

Background

1 The Committee previously considered proposals contained in document MEPC 82/6/31 (Brazil et al.) and the subsequent update provided in document ISWG-APEE 1/2/5 (Bahamas et al.) to focus the calculation of the attained carbon intensity indicator (CII) on fuel consumption while ships are under way. These submissions demonstrated that fuel consumption occurring while ships are not under way can materially affect CII ratings and may result in outcomes that do not accurately reflect the operational efficiency of a ship.

2 MEPC 81 adopted, by resolution MEPC.385(81), amendments to appendix IX of MARPOL Annex VI requiring the collection of more granular fuel consumption data, including fuel consumption when ships are not under way. This enhanced data set provides the Organization with an opportunity to undertake a comprehensive reassessment of the CII framework using data derived from the IMO Data Collection System (DCS).

3 The amendments to appendix IX of MARPOL Annex VI entered into force on 1 August 2025, and more granular reporting has been mandatory since 1 January 2026. This means that data which distinguish between fuel consumption under way and not under way will be submitted to the IMO Ship Fuel Oil Consumption Database in 2027.

4 Further to the amendments to appendix IX of MARPOL Annex VI concerning enhanced data granularity adopted by MEPC 81, MEPC 83 adopted amendments to section 7 of the *2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)* (resolution MEPC.401(83)) concerning the definitions of "under way" and "not under way", linking the definitions to the *IMO Compendium on facilitation and electronic business* (FAL.5/Circ.56):

"Under way and not under way"

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."

5 In relation to the Work plan for phase 2 of the review of the short-term GHG reduction measure (MEPC 83/17/Add.1, annex 5), MEPC 83 agreed to advance the review by adopting a two-phase approach.

6 The first phase of the review was completed at MEPC 83 with a conclusion on the CII reduction (Z) factors for 2027 to 2030. At the same session, the Committee also agreed to the Work plan, which is expected to conclude at MEPC 87 (spring 2028).

7 According to the Work plan, MEPC 86 (initially envisaged to be held in the spring of 2027) will consider further concrete proposals for CII correction factors and voyage adjustments and/or reference line adjustments.

8 In the phase 2 review, which commenced at MEPC 84, the Committee recognized the merits of further exploring alternative CII metrics and noted aspects requiring further consideration, such as possibly limiting the CII calculation to fuel consumption while under way.

9 At MEPC 84, the Committee invited interested Member States and international organizations to submit proposals to MEPC 85 for further consideration of the development of other CII metric(s).

Discussion

10 The availability of enhanced IMO DCS data represents a significant improvement in the data available to the Committee. The revised reporting requirements will allow the Organization to distinguish fuel consumption occurring while ships are under way from fuel consumption while ships are not under way.

11 Should the Committee decide to focus the CII calculations on fuel consumption while ships are under way, consequential adjustments to the reference lines would be necessary. The reference lines were originally derived using a data set that incorporated all reported fuel consumption.

12 Furthermore, the correction factors and voyage adjustments under the *2022 Interim Guidelines on correction factors and voyage adjustments for CII calculations (CII Guidelines, G5)* (resolution MEPC.355(78)) may require consequential review. In particular, corrections and adjustments relating to port operations may no longer be necessary, and could therefore be deleted, should fuel consumption while ships are not under way be excluded from the CII calculation. Other correction factors and voyage adjustments may require amendment or incorporation into the revised framework, as appropriate, in order to maintain consistency and avoid unintended consequences across ship types, trades and operational profiles. As part of the ongoing review of the short-term GHG reduction measure, the adoption of new correction factors and/or voyage adjustments or other refinements to the CII framework may be necessary, considering that certain ship types may have unique operational characteristics that should be taken into account.

13 To support evidence-based decision-making, the Committee should undertake a comprehensive distributional analysis using the enhanced IMO DCS data set for the 2026 calendar year prior to the adoption of revised reference lines. Such an analysis should include:

- .1 percentage changes in attained CII values by ship type;
- .2 percentage changes in attained CII values by ship size segment;
- .3 impact on the distribution of CII ratings (A, B, C, D and E); and
- .4 assessment of whether existing correction factors and voyage adjustments remain necessary, require modification or should be integrated directly into the revised framework.

14 Particular attention should be paid to identifying whether the proposed adjustments create significant shifts in CII rating distributions between ship types and trades that could result in unintended market distortions or unequal treatment of comparable ships. Any recalibration of the CII framework should:

- .1 improve fairness and comparability between ships;
- .2 better reflect the efficiency of ship operations while under way;
- .3 reduce sensitivity to factors outside the control of the ship;
- .4 maintain transparency, simplicity and verifiability;
- .5 be supported by a robust analysis of the enhanced IMO DCS data set;
- .6 contribute to the objectives of the 2023 IMO GHG Strategy; and
- .7 not increase the administrative burden for shipowners, managers or verifiers.

15 With regard to emissions when ships are not under way, the co-sponsors refer to the discussion in document MEPC 82/6/31, and in particular the importance of further encouraging ports to work in line with resolution MEPC.366(79) through a combination of facilitating measures and cooperation with partners in the transport chain to optimize port calls, thereby also improving the efficiency of the operations after the end of the sea passage.

Proposal

16 The Committee is invited to:

- .1 recognize that the enhanced granularity of the IMO DCS provides an appropriate basis for further consideration of the CII framework and utilize the enhanced 2026 IMO DCS data set to reassess and recalibrate the CII reference lines;
- .2 consider whether any correction factors and voyage adjustments adopted under the existing framework should be amended, retained or incorporated into the revised framework, as appropriate;
- .3 agree that a comprehensive distributional impact assessment should be undertaken, including the effects of the proposed revisions on attained CII values by ship type and size segment and on the distribution of A to E ratings, prior to adoption of the revised reference lines; and
- .4 agree on appropriate arrangements for undertaking this assessment.

Action requested of the Committee

17 The Committee is invited to consider the proposal set out in paragraph 16 above and to take action as appropriate to ensure that any future amendments to the CII framework are based on robust IMO DCS data and that the CII ratings reflect the real operational efficiency of ships.
