



INTERSESSIONAL MEETING OF THE
WORKING GROUP ON REDUCTION OF
GHG EMISSIONS FROM SHIPS
22nd session
Agenda item 2

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**CONSIDERATION OF PROPOSALS, INCLUDING DOCUMENTS SUBMITTED TO
MEPC 84 AND 85, PREVIOUS SESSIONS OF ISWG-GHG, AS WELL AS DOCUMENTS
SUBMITTED TO ISWG-GHG 22, ON HOW TO ADDRESS CONCERNS WITH THE DRAFT
AMENDMENTS TO MARPOL ANNEX VI ON THE IMO NET-ZERO FRAMEWORK,
IN LINE WITH THE 2023 IMO GHG STRATEGY**

**Guiding principles for developing mid-term GHG reduction measures to build
convergence among Member States leading up to MEPC 85
and the resumed MEPC/ES.2**

Submitted by Saudi Arabia and United Arab Emirates

SUMMARY

Executive summary: This document proposes a way forward on the mid-term GHG reduction measures in response to the lack of consensus to date. It recalls the guiding principles established in the 2023 IMO GHG Strategy, and sets out a series of principles which the co-sponsors suggest should guide the development of mid-term GHG reduction measures and the Working Group's deliberations at ISWG-GHG 22 and ISWG-GHG 23.

*Strategic direction,
if applicable:* 3

Output: 3.2, 3.4

Action to be taken: Paragraph 16

Related documents: MEPC/ES.2/2/4, MEPC/ES.2/2/6 and MEPC/ES.2/2/7

Background

1 Member States agreed to adjourn the adoption of the current draft IMO Net-Zero Framework during MEPC/ES.2, held in October 2025. The co-sponsors express its full commitment to finding a way forward on this matter in a manner that builds consensus and addresses the core concerns raised in previous discussions, including as referenced in documents MEPC/ES.2/2/4, MEPC/ES.2/2/6, and MEPC/ES.2/2/7 (Bahrain et al.). The co-sponsors note that consensus on the approach to addressing GHG emissions in the shipping sector is critical to ensuring smooth and effective implementation of any framework in advancement of the 2023 IMO GHG Strategy. It is in this spirit that the co-sponsors recognize the need to look beyond the current draft IMO Net-Zero Framework in order to achieve consensus, in a manner rooted in guiding principles that address the core concerns of Member States and key industry players alike.

2 At IMO, decisions are usually taken by consensus and, if no consensus can be reached, any Member State may request that the matter be put to a vote. At MEPC/ES.2, held in October 2025, a significant number of countries abstained during the vote and supported the adjournment of the adoption session, demonstrating the lack of consensus around the framework as currently presented. During MEPC/ES.2, the suggestion to utilize the tacit acceptance procedure in relation to the current draft IMO Net-Zero Framework was unacceptable to the majority of delegations, which were ready to support a proposal by the United States on the use of the MARPOL Convention's "explicit acceptance" or "opt-in" procedure (MEPC/ES.2/J/4).

3 The co-sponsors therefore submit the following considerations, in the spirit of multilateral cooperation and consensus, to guide all efforts and discussions related to pursuing viable alternatives to the current draft IMO Net-Zero Framework.

Discussion

4 While developing the *2023 IMO Strategy on reduction of GHG emissions from ships* (2023 IMO GHG Strategy) (resolution MEPC.377(80)), parties agreed on a set of overarching principles to guide the implementation of 2023 IMO GHG Strategy, and guide the development of different measures within. Such principles were regarded instrumental to ensure effective and practical implementation of the 2023 IMO GHG Strategy, in a manner that aligns with and build upon the multilateral efforts under the United Nations Framework Convention on Climate Change (UNFCCC), Paris Agreement as well as the IMO itself.

5 The principles guiding the 2023 IMO GHG Strategy include (as outlined under section 2 of the 2023 IMO GHG Strategy):

- .1 the need to be cognizant of the principles enshrined in instruments already developed, such as:
 - .1 the principle of non-discrimination and the principle of no more favourable treatment, enshrined in MARPOL and other IMO conventions; and
 - .2 the principle of common but differentiated responsibilities and respective capabilities, in the light of different national circumstances, enshrined in UNFCCC, its Kyoto Protocol and the Paris Agreement.
- .2 the requirement for all ships to give full and complete effect, regardless of flag, to implementing mandatory measures to ensure the effective implementation of this Strategy;
- .3 the need to consider the impacts of measures on States, including developing countries, in particular on least developed countries (LDCs) and small islands developing States (SIDS), and their specific emerging needs, as recognized in the Revised Strategic Plan for the Organization (resolution A.1149(32)); and
- .4 the need for evidence-based decision-making balanced with the precautionary approach as set out in resolution document MEPC.67(37).

6 The current draft IMO Net-Zero Framework does not demonstrate sufficient technical maturity, operational readiness and convergence among Member States, and therefore does not align with these principles. In particular, the draft does not account for the principle of common but differentiated responsibilities and respective capabilities, in the light of different national circumstances. The need for evidence-based decision-making has not been satisfied due to the lack of a comprehensive impact assessment on the proposed draft and due to the arbitrary nature in which the costs of Surplus Units and Remedial Units are set. All in all, the co-sponsors reaffirm that the draft IMO Net Zero Framework, including its structural design, is incompatible with the principles laid out in the 2023 IMO GHG Strategy.

7 Accordingly the co-sponsors suggest that the Working Group can bring convergences among parties leading up to MEPC 85, by outlining a set of principles for the development of mid-term GHG reduction measures, building on the guiding principles set out in the 2023 IMO GHG Strategy, as well as party submissions to ISWG-GHG 22 and ISWG-GHG 23.

Guiding principles

8 Firstly, any framework that will be adopted must serve as an effective tool to enable the shipping sector to achieve net-zero emissions by or around mid-century while safeguarding international trade, food and energy security and economic development. Any adopted framework must be consensus-based and rooted in true multilateral deliberations that address the concerns of Member States while leaving no one or group behind. It should promote positive, inclusive and effective international cooperation, based on innovation, capacity-building, implementation and win-win outcomes, rather than punitive measures.

9 The co-sponsors stress that the framework must avoid arbitrarily determined quantitative elements. Quantitative parameters and design features should be established through objective evidence-based assessments and considerations, reflecting sectoral realities, the maturity and availability of solutions, and the special needs and national circumstances of Member States, in particular developing countries. The framework must not penalize existing or future investments in ships and fleets, nor should it compromise national security imperatives related to food, water, energy or critical resources.

10 The framework must not exacerbate inequalities or lead to disproportionate benefits for a limited number of Member States or companies. Any benefits arising from implementation must be shared fairly. Timelines and trajectories must be realistic and pragmatic, taking into account the affordability, scalability and global availability of fuels and technologies. The approach must be comprehensive and technology-agnostic, enabling all credible emissions-reducing solutions, including retrofitting and use of innovative technologies without targeting particular fuels or pathways, and allowing shipping companies to select options appropriate to their operational contexts.

11 In line with established international principles, the framework must account for differing stages of development, and reflect the overriding priorities of developing countries for economic growth and poverty eradication, in line with the guiding principle of common but differentiated responsibilities and respective capabilities, in the light of different national circumstances, as enshrined in the UNFCCC, its Kyoto Protocol and its Paris Agreement, as outlined in the 2023 IMO GHG Strategy. It must respect bottom-up and nationally determined approaches and must not impose top-down restrictions or international penalties that undermine agreed multilateral climate agreements.

12 The co-sponsors further underline that the framework should not include centrally determined market elements such as fixed or administered carbon prices. It must avoid shifting the burden of climate action onto consumers and populations with which the Committee does not represent or consult. Any framework must operationalize the full assessment and management of socio-economic impacts, ensuring that such impacts are avoided or effectively remedied. It must ensure that solutions deployed meet appropriate standards and do not introduce new hazards. Finally, it must not restrict or undermine the international system of free trade or the stability of global maritime transport.

13 The co-sponsors further emphasize that predictability and political acceptability are essential for the effective implementation of the framework. A framework that imposes sudden or unclear financial burdens will not command sustained support from Member States or industry, and risks undermining confidence in the process. What is required is a practical and transparent approach that Members can implement in their national contexts and defend domestically. Only a balanced framework, combining environmental ambition with economic realism, will secure the broad support necessary for a credible and orderly transition of the sector.

14 The co-sponsors therefore stress the necessity of pursuing a revised approach that is comprehensive and reflective of the diverse circumstances of Member States, particularly developing countries, while safeguarding global trade, food and energy security.

15 On this basis, the co-sponsors note that the current draft of the IMO Net-Zero Framework as presented in October 2025 does not reflect the core concerns of many Member States and therefore does not enjoy the consensus needed to ensure effective implementation. The co-sponsors therefore invite the Working Group to utilize the above principles to guide discussions and the work on viable alternatives in the spirit of moving forward together. This approach is necessary to protect the maritime sector, preserve energy and food security, maintain the stability of global trade, and ensure that any future framework is fair, inclusive, realistic and conducive to effective implementation.

Action requested of the Working Group

16 The Working Group is invited to consider the information provided in this document, in particular the principles laid out in this document, together with the guiding principles within the 2023 IMO GHG Strategy as mentioned in paragraph 5, and take action as appropriate.
