

# Adjournment of the IMO's Net-Zero Framework – what does it mean?

Brief | October 2025

## 1. Introduction

The Second Extraordinary Session of the International Maritime Organization's (IMO) Marine Environment Protection Committee (MEPC ES.2), which convened 14 to 17 October 2025, was expected to mark a pivotal moment in international climate governance: the adoption of the IMO's Net-Zero Framework (NZF), amongst other draft regulations. The NZF is a draft global maritime regulation mandating emissions reductions across the international shipping industry.

The NZF is intended to be included as an amendment to Annex VI of the International Convention on the Prevention of Pollution from Ships (MARPOL).<sup>1</sup> A distinct procedure must be followed to include the NZF within the existing text of MARPOL.

If adopted at MEPC ES.2, the NZF would have proceeded to the 'acceptance' stage (2025–2026), before its entry into force (2027) and operationalisation (2028).<sup>2</sup> However, at MEPC ES.2, a simple majority of IMO Member States present and voting voted in favour of adjourning the meeting, and therefore delayed adoption of the NZF, for one year. This immediately prevented any further consideration of the adoption of the draft

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<sup>1</sup> The International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto (MARPOL).

<sup>2</sup> Further information on the procedure for amending MARPOL can be found at: Opportunity Green, 'What's the procedure for amending MARPOL Annex VI?' (May 2025), available at: <https://www.opportunitygreen.org/factsheet-amending-marpol-annex-vi>

amendments to MARPOL Annex VI, including the NZF at this meeting. The adjournment does not affect the content of the NZF itself, which remains in current form.

While disappointing, the one-year adjournment is an opportunity for countries to re-build support for the NZF's adoption, including by clarifying foundational details that have been subject to limited discussion to date, such as the operationalisation of the IMO Net-Zero Fund and NZ definition and reward. Sustained cooperation at ISWG-GHG20 in the week following the MEPC ES.2 indicates broad recognition of the NZF's value and an interest in shaping its implementation. Member States should continue this positive engagement over the course of interim intersessionals prior to the reconsideration of the NZF in 2026 (date to be agreed at MEPC 84 in April 2026).

## 2. Outcomes of MEPC ES.2

### 2.1 Meeting adjournment

**What happened at MEPC ES.2?** The motion by Saudi Arabia to adjourn negotiations was a procedural motion under Rule 31 of the MEPC Rules of Procedure. This applied to the conduct of business rather than the question of adoption of the draft measures. This enabled all IMO Member States present and voting to vote and influence the trajectory of the NZF, irrespective of their Annex VI status<sup>3</sup>.

Of those attending MEPC ES.2, with voting rights and credentials in order, 57 Member States voted in for adjournment, 49 opposed, 21 abstained, and 8 were not present during the vote. Of the 57 votes for adjournment, 36 were MARPOL Annex VI parties, and of those in opposition, 46.

The procedural sequence was a key point of discussion in the room, as whilst several delegations including Brazil and Denmark had expressed support for moving to a vote on adoption, the procedural motion to adjourn under Rule 31 of the MEPC Rules of Procedure had 'precedence, over all other proposals or motions before the meeting'.<sup>4</sup> This rule effectively halted further consideration of the NZF due to the voting outcome.

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<sup>3</sup> In accordance with the relevant procedure for the amendment of Annex VI of MARPOL, only parties to Annex VI would have been able to vote on adoption of the NZF.

<sup>4</sup> MEPC.1/Circ.919, RULES OF PROCEDURE OF THE MARINE ENVIRONMENT PROTECTION COMMITTEE, Rule 31.

## Relevant procedural rules utilised for MEPC ES.2

Provision	Source	Summary and explainer
<b>Rule 31 – Order of procedural motions</b>	Rules of Procedure of the MEPC <sup>5</sup>	<p><i>'Subject to the provisions of rule 30 the following motions shall have precedence, in the order below:</i></p> <ol style="list-style-type: none"> <li>1. <i>to suspend a meeting;</i></li> <li>2. <i>to adjourn a meeting;</i></li> <li>3. <i>to adjourn the debate on the question under discussion; and</i></li> <li>4. <i>for the closure of the debate on the question under discussion.</i></li> </ol> <p><i>Permission to speak on a motion shall be granted only to the proposer and in addition to one speaker in favour of and two against the motion, after which it shall be put immediately to the vote'.</i></p> <p>In the case of MEPC ES.2, Saudi Arabia's motion to adjourn took precedence under this rule and therefore had to be voted on immediately, before discussion on any other matter could continue.</p>
<b>Rule 35 – voting rights</b>	Rules of Procedure of the MEPC	<p>When the Committee considers matters not connected with an international convention, all Members and participants may take part, but only Members of the IMO may vote, each having one vote. On the other hand, when the Committee acts under a convention or other instrument (such as MARPOL), all Members may participate, but voting on amendments must follow the provisions of that convention.</p> <p>In practice, this means that at MEPC ES.2 all IMO Members could vote on the procedural motion to adjourn, since it was not connected to a substantive amendment under MARPOL.</p> <p>Only Parties to the relevant Annex, in this case MARPOL Annex VI, may vote on adoption of amendments such as the Net-Zero Framework.</p>
<b>Article 16(2)(d)</b>	International Convention for the Prevention of Pollution from Ships (MARPOL 1973)	Amendments to the Convention shall be adopted by a two-thirds majority of Parties present and voting. For Annexes (e.g., Annex VI), voting is limited to parties bound by that Annex.

<sup>5</sup> MEPC.1/Circ.919, RULES OF PROCEDURE OF THE MARINE ENVIRONMENT PROTECTION COMMITTEE.

## **2.2 Progress prior to adjournment**

Member States had been able to progress some aspects of work related to the NZF prior to adjournment. These aspects are relevant for the continued development of the guidelines, guidance and other non-binding materials supporting the implementation of the IMO Net-Zero Framework, and for the reconvening of MEPC ES.2 in 2026.

However, as the Committee was unable to adopt its final report, the status of work prior to adjournment is somewhat unclear and will likely be revisited in one year's time.

Key points of progress during MEPC ES.2 included:

**Recommended revisions to the draft work plan to prepare for entry into force of the NZF:** During MEPC ES. 2, the Working Group on Reduction of GHG Emissions from Ships (WG-GHG) reviewed and revised the draft work plan<sup>6</sup> for the preparation of guidelines, governing provisions and other non-binding instruments relevant to the implementation of the NZF. The revised work plan can be found in document MEPC ES.2/WP.4. WG-GHG sent the revised work plan to the Committee for approval. This was inhibited by the adjournment of MEPC ES.2.

**A draft cover resolution on adoption of the Revised MARPOL Annex VI:** A cover resolution is a non-binding document which accompanies amendments made to MARPOL, and other treaties under the legal framework of the IMO. Cover resolutions usually clarify procedural aspects, such as the legal basis for the amendment(s), the procedure for acceptance and entry into force, and request communication of the amendment(s) to relevant stakeholders. They also provide an opportunity for references to be made to any policies, principles, agreements or other information that may be considered associated with or relevant to the amendment(s).

A draft cover resolution was set to be agreed at MEPC ES.2. A text was provided after discussion amongst Member States, however, adjournment prevented its approval by the Committee. The cover resolution drafted at MEPC ES.2 will likely provide a basis for discussions at the reconvening of MEPC ES. 2. Some aspects to note, include:

- It was agreed, subject to the approval of the Committee, that the cover resolution would, in addition to procedural references, reaffirm the 2023 IMO GHG Strategy; acknowledge the challenges that developing countries, in particular least developed countries (LDCs) and small island developing States (SIDS), may face in the implementation of the draft amendments; and recognise the importance of the human element, in particular in relation to the impact on maritime professionals, in the safe implementation of the draft amendments.

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<sup>6</sup> The draft work plan was presented by the Secretariat in Document MEPC ES.2/3.

- The delegation of the United Arab Emirates also proposed to insert text in the cover resolution related to the co-existence of global and regional regulations, drawing on the language used by the ICAO Assembly in its resolution A40-19 Consolidated statement of continuing ICAO policies and practices related to environmental protection – Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA).<sup>7</sup> After some discussion, it was agreed to include language reaffirming that the IMO Net-Zero Framework is the only global mid-term measure for international shipping, once entering into force.
- During discussions, the delegation of the United States proposed replacing the provisions on tacit acceptance<sup>8</sup> of MARPOL amendments by provisions on explicit acceptance.<sup>9</sup> This was highly contentious as the explicit procedure could lead to significant delays in the entry into force of the NZF. No conclusion was reached prior to the adjournment of MEPC ES.2, with the option of explicit acceptance remaining in the draft cover resolution.

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<sup>7</sup> This proposal was made during the meeting of MEPC, in the presence of observers and media representation.

<sup>8</sup> Further information on tacit and explicit acceptance procedures is available at: Opportunity Green, 'What's the procedure for amending MARPOL Annex VI?' (May 2025), available at: <https://www.opportunitygreen.org/factsheet-amending-marpol-annex-vi>

<sup>9</sup> This proposal was made during the meeting of MEPC, in the presence of observers and media representation. Public reporting is from various media outlets, including, for example, Declan Bush, 'US tries to hobble NZF with late bid to change acceptance rules' (Lloyd's List, 15 October 2025), available at: [US tries to hobble NZF with late bid to change acceptance rules :: Lloyd's List](https://www.lloydslist.com/us-tries-to-hobble-nzf-with-late-bid-to-change-acceptance-rules)

### **Fact box: The 'acceptance' procedures for MARPOL amendments**

After 'adoption' of the measures by the MEPC, the amendments to MARPOL Annex VI must be 'accepted' by MARPOL's Annex VI Parties before entering into force. There are two procedures for acceptance:

- **The accepted unless rejected procedure (tacit acceptance procedure):** The amendments to Annex VI can be deemed to have been accepted without a formal vote at the end of a period – to be determined by MEPC at the time of its adoption. This period shall be not less than ten months. The amendment will then be accepted, unless, during that period, an objection is communicated to the IMO by not less than one third of the Parties to Annex VI or by a group Parties whose combined merchant fleets make up at least 50% of the gross tonnage of the world's merchant fleet. Nonetheless, the MEPC, at the time of its adoption, may still decide that the amendment should be accepted using the 'rejected unless accepted' procedure.
- **The rejected unless accepted procedure (explicit or opt-in acceptance procedure):** An amendment to an article of the Convention shall be deemed to have been accepted on the date on which it is accepted by two thirds of the Parties to Annex VI, the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant fleet. The amendment shall then enter into force six months after the date of its acceptance with respect to the Parties which have declared that they have accepted it.

If the explicit procedure were called for, the decision would be taken in accordance with usual decision-making procedures at MEPC and the relevant rules of procedure.

**Why does it matter?** The chosen acceptance procedure implicates whether parties have to actively undertake acceptance processes at the domestic level, the time required for an amendment to enter into force, and how many parties are bound by the amendments after their entry into force.

- *Acceptance procedures at domestic level:* Under the tacit procedure, a State's acceptance is assumed unless stated otherwise. This means States do not need to execute their respective domestic acceptance procedures. The legal and administrative processes, as well as time required to formally register acceptance, would vary per state under the explicit acceptance procedure, likely delaying entry into force and hindering global acceptance rates.
- *Entry into force for whom?* Under the tacit acceptance procedure, the amendment enters into force 6 months after its acceptance for all parties, unless a party has explicitly declared it does not accept the amendment or that its express approval is needed. Under the explicit procedure, the amendment enters into force 6 months after its acceptance, but only for those that have accepted it.

### 3. Implications for the Net-Zero Framework

The extraordinary session will be reconvened in one years' time and adoption will be considered again. In the interim, Member States and others will continue to work towards consensus on the IMO Net Zero Framework. However, there may be consequences of MEPC ES.2's delay on the NZF itself.

Key issues for consideration include implications related to the dates and timelines presented in the text of the NZF, and potential suggestions for 'reopening' of the NZF's text.

#### 3.1. Consequences for emissions reduction and a just and equitable transition

The delay in adopting the NZF at MEPC ES.2 risks undermining progress toward the emissions-reduction targets established in the IMO 2023 GHG Strategy and risks further misalignment between international shipping's decarbonisation and the Paris Agreement's 1.5 °C temperature goal.

The 2023 Strategy committed to set international shipping on track for:

- at least 20%, striving for 30%, emissions reductions by 2030, compared to 2008;
- at least 70%, striving for 80% emissions reductions by 2040;
- net-zero GHG emissions by or around, i.e. close to 2050.

Analyses suggest the NZF in its existing form would only achieve only 8–10% emissions reductions.<sup>10</sup> The delay would likely only exacerbate this shortfall, creating regulatory uncertainty and allowing emissions to continue unabated.

#### 3.2. Consequences for the implementation timeline

The NZF set out the following milestones for implementation:

- Ship registration in the IMO GFI Registry by 1 October 2027 and shall pay its first annual administration fee by 30 June 2028<sup>11</sup> (Regulation 38(2)).
- NZ rewards defined by the Committee no later than 1 March 2027 and every five years thereafter and the methodology to determine such reward (Regulation 39(3)).

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<sup>10</sup> See Transport & Environment, 'IMO Net-Zero Framework: Assessing the impact of the IMO's draft Net-Zero Framework' (Briefing, April 2025) <https://www.transportenvironment.org/uploads/files/Impact-of-the-IMOs-draft-Net-Zero-Framework-April-2025.pdf> accessed 29 October 2025; and, Smith, T., Frosch, A., Fricaudet, M., Majidova, P., Oluteye, D., Baresic, D. & Rehmatulla, N. (2025) An overview of the discussions from IMO's 83rd Marine Environment Protection Committee, London, UK.

<sup>11</sup> The Secretary-General of the Organization shall determine the annual administration fee to cover the administrative costs of the IMO GFI Registry, taking into guidelines developed by the Organization (Regulation 38(3)).

- Determine the mechanism for reviewing and defining the price of a Tier 1 and Tier 2 remedial unit by 1 January 2028, for the reporting periods starting 2031 and onwards (Regulation 36(10)).
- Ships to calculate the attained annual GFI after the end of calendar year 2028 and after the end of each calendar year thereafter (Regulation 33(1)).
- Initial pricing of remedial units set for reporting periods between 2028–2030. Tier 1 remedial unit shall be US\$100 per tonne of CO<sub>2</sub>eq, and Tier 2 remedial unit shall be US\$380 per tonne of CO<sub>2</sub>eq, both on a well-to-wake basis (Regulation 36(8)).

With adoption deferred until at least October 2026, each of these milestones will need to be considered in light of the one-year delay, requiring text-based amendments to align with the regulatory calendar.

### **3.3. Potential renegotiation of the NZF**

It has been suggested that some Member States may wish to 'reopen' the text of the NZF with the suggestion that this will facilitate their support. However, while some Member States may limit potential revisions to technical refinement, others may seek to revisit ambition levels. This poses a risk of a weaker, slower, or more fragmented framework, with no guarantee of smooth passage through the legislative amendment procedure once revised.

The framework's design elements are fundamental to determining how ambitious the emissions reductions it can achieve are. Even before the adjournment, the framework's targets fell short of the ambition required to deliver 1.5C aligned emissions reductions.<sup>12</sup> Reopening the text therefore further risks weakening the ambition presented in the NZF.

## **4. Next steps and recommendations**

The IMO Secretariat has confirmed that the NZF will be reconsidered in 2026 at a reconvening of MEPC ES.2. The specific dates and programme for this meeting will be set at MEPC 84 (April 2026).

**Intersessional work:** In the interim, as evidenced by discussions at the 20<sup>th</sup> Intersessional Working Group on GHG Emissions Reductions from Ships (ISWG-GHG 20) the week following MEPC ES.2, intersessional work is continuing on matters including the IMO LCA Guidelines and the guidelines and governance arrangements related to the implementation of the NZF and its Net-Zero Fund. The active participation of Member States in these discussions, signals a continued willingness to engage on the NZF and

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<sup>12</sup> Transport & Environment. (2025) *Impact of the IMO's draft Net-Zero Framework: briefing – April 2025*. Available at: <https://www.transportenvironment.org/uploads/files/Impact-of-the-IMOs-draft-Net-Zero-Framework-April-2025.pdf> (accessed 29/10/25).

refine key details to ensure smooth implementation. The sustained cooperation suggests that, while there were divisions during MEPC ES.2, there remains broad recognition of the NZF's value and a shared interest in shaping its practical implementation. Advancing work on the guidelines and other implementing instruments may help to maintain momentum and build confidence to facilitate wider support for the NZF's adoption. It is imperative that Member States take the opportunity to continue engaging in such discussions.

In particular, Member States and organisations may wish to utilise the one-year delay to clarify key details that have been subject to limited discussion to date. These key details include:

- **Designing an equitable revenue distribution and fund governance framework:** Enshrining principles of equity and fairness within the IMO Net-Zero Fund's operating rules will be essential to ensuring those most vulnerable to the impacts of both climate change and decarbonisation initiatives are not left behind during the maritime transition. Equitable design of the IMO Net-Zero Fund is essential to overcoming concerns about the NZF's disproportionate negative impacts on certain countries and regions and ultimately enabling a just and inclusive transition worldwide. Clear fund governance structures that guarantee inclusive representation, accessibility to funds, and equity-focused disbursement may help to strengthen confidence in the NZF's fairness and effectiveness, increasing the likelihood of consensus at the next MEPC session.
- **Designing robust guidelines related to zero or near-zero GHG emission technologies, fuels and/or energy sources (ZNZs):** The adjournment period offers an important opportunity to enhance the technical robustness of the guidelines on Zero and Near-Zero (ZNZ) fuels and lifecycle GHG (LCA) analysis. Strengthening these elements will not only ensure environmental integrity but also help build confidence and consensus among Member States ahead of the NZF's reconsideration for adoption.