Monday 13 October 2025

To: Secretary-General and Member State Delegations, International Maritime Organization (IMO)

Subject: Amplifying the IMO Net-Zero Framework signal for e-fuels

Dear Secretary-General and IMO Delegates,

At its 83rd session, in April 2025, the Marine Environment Protection Committee approved draft amendments to MARPOL Annex VI, with the intent to adopt at the extraordinary MEPC session taking place in October 2025 and to thus establish the IMO Net Zero Framework (hereafter the NZF). The NZF is a critical step forward as a policy signal for the energy transition of international shipping and we welcome its adoption in October 2025. That said, significant work remains to ensure the reduction of GHG emissions aligned with the IMO 2023 Strategy.

The NZF's effectiveness now depends on how the implementation Guidelines are designed and what signals policymakers choose to embed within them. In the view of the signatories, the current framework does not provide sufficiently strong investment signals for e-fuels. The NZF, as currently drafted, and without additional prioritisation for e-fuels in the relevant implementation Guidelines, risks incentivising pay-to-pollute strategies while also stimulating investment in transitional fuels, such as LNG, first-generation biofuels, and blue fuels. This would leave scalable zero-emission e-fuels under-incentivised from a regulatory standpoint and would delay large-scale deployment of the only long-term zero-emission fuels capable of delivering deep reductions aligned with the IMO 2023 Strategy. Without immediate and unambiguous signals for the production and uptake of e-fuels, the global fleet risks "locking in" short-term fuel pathways that undermine both ambition and cost-effectiveness over time.

Globally, there are an estimated 73 million tonnes per year of green hydrogen production planned for 2030, yet only 13% of these volumes are linked to offtake agreements.[1] In the absence of stronger policy signals, many of these green hydrogen projects may struggle to reach Final Investment Decision (FID) and thus fail to become operational. This is a challenge shared by all e-fuels as the dynamics seen in green hydrogen mirror those across the wider e-fuels landscape. If the IMO NZF were to place greater emphasis on green e-fuels uptake, it would provide the necessary demand

[1] BloombergNEF. Data as of May 2025. Supply numbers are from BloombergNEF's Clean Hydrogen Production Assets Database.

certainty to unlock investment and ensure the maritime sector's transition stays on track.

Together, the signatories to this letter have projects in Africa, South and North America, Europe, South Asia as well as Oceania.

We therefore call on the IMO to:

- **Adopt the Net-Zero Framework** at the Extraordinary Marine Environment Protection Committee Session from October 14th to 17th 2025.
- **Incorporate an e-fuels multiplier** into the relevant NZF Guidelines—a temporary, self-activating, non-monetary and low-burden mechanism that counts each unit of certified e-fuel multiple times (at least twice) times towards GHG Fuel Intensity (GFI) compliance. This targeted accelerator would send critical upstream signals allowing projects to reach Final Investment Decisions and expand necessary production of e-fuels. Temporary multipliers (or similar accounting accelerants) are an established policy tool to kick-start high-cost, low-emission fuels by increasing the effective credit or reward they receive during an initial ramp-up period, thereby reducing first-mover risk and mobilising offtake agreements to achieve investments. ITF analysis[2] identifies blending mandates and temporary multiplier effects as effective ways to accelerate supply and demand for e-fuels.
- **Ensure dedicated and optimised rewards for the use of e-fuels** within the Guidelines related to zero or near-zero GHG emission technologies, fuels and/or energy sources (ZNZs) and further, ensure that the reward methodology is differentiated between fuels and technologies, recognising that different fuels and technologies have differing cost, environmental and production characteristics.

The NZF is a once-in-a-generation opportunity. By sending clear and durable signals in favour of scalable zero-emission e-fuels, the IMO can ensure that international shipping is not only on track to transition its fuel mix to reduce GHG emissions, but that it does so in a cost-effective and sustainable way. Without these calibrations, the NZF risks under-rewarding the very fuels that can deliver deep decarbonisation at scale.

We are ready to share technical evidence and industry expertise to support this work.

Sincerely,

[2] ITF 2023 'The Potential of E-fuels to Decarbonise Ships and Aircraft'


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Elyse


Zero Waste


arianeGROUP


HIF


MGH
energy


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