ISWG-GHG 22: 6PAC+ Positions and Perspectives

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Abstract

The 22nd Intersessional Working Group on the Reduction of GHG emissions from ships (ISWG-GHG 22) was held from the 1st - 4th September 2026. Following the re-opening of the Net-Zero Framework for amendments at the 84th Marine Environment Protection Comittee meeting (MEPC 84), the purpose of this meeting was to begin the consideration on how to address concerns with the MARPOL Annex VI Amendments of the Net-Zero Framework. Although there was a general willingness to work together on the consideration of ways forward, Member State discussions demonstrated continuing divergence on core issues of the design and nature of the final Mid-Term measure. ISWG-GHG 22 ended without any meaningful advancement of the discussion, requesting rather that Member States continue discussions intersessionally on how to address concerns, with a view to submitting proposals to MEPC 85 and ISWG-GHG 23, as appropriate. No final decision was expected at ISWG-GHG 22. Nevertheless, discussions at this session have continued to shape the final outcome of the Framework expected to be deliberated at the second Extraordinary Session of MEPC that will be reconvened in December 2026 following the conclusion of the 85th MEPC meeting. A Chair designed and driven landing zone remains possible if Member States fail to achieve significant convergence on a final outcome.
In this Working Paper we ask if sufficient progress is being made to ensure a high ambition outcome at IMO as we approach shipping's major decision-making point on GHG reductions for this sector.

Keywords: International shipping; ISWG; ISWG-22; Just and Equitable Transition; GHG emissions pricing; International Maritime Organization; Net-Zero Framework; MARPOL Annex VI; 6PAC+

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1. Context

International shipping is often described as a 'hard-to-abate' sector. Negotiations at the specialist UN agency for regulating shipping, the International Maritime Organization (IMO), to reduce shipping's Greenhouse Gas (GHG) emissions have been ongoing for three decades.[1] Since 2015 an informal alliance of Pacific and other SIDS and LDCs nicknamed the '6PAC+' have been actively advocating for a 1.5-degree commensurate agenda[2]. In 2023 the IMO unanimously agreed its Strategy for Reduction of GHG emissions from Shipping, setting hard targets leading to full and equitable decarbonization transition by mid-century[3].

However, since setting this historic objective, negotiations on the basket of implementation measures necessary, agreed as requiring both a technical and economic measure have gone from agreement in principle on draft text for the requisite amendments to MARPOL - with a large majority in favor of a 'Net-zero Framework (NZF)' inclusive of a Fund for managing revenues from implementation of a price on emissions – to an increasingly entrenched stand-off between high ambition states and a US/petro-State bloc adamantly opposed to any economic measure at all.

ISWG-GHG 22 was never a decision-making event but marked the last stop in a lengthy negotiation process ahead of ISWG-GHG23 / MEPC 85 ES.2 in November/December 2026 where a major decision is required. In this Working Paper we reflect on the outcome of this discussion and ask where this leaves the various blocs of member State interest in the lead up to November/December's critical session.

2. 6PAC+ Objectives at ISWG-GHG 22

The core members of the 6PAC+, Fiji, Kiribati, Marshall Islands, Naoero, Palau, Solomon Islands, Tonga, Tuvalu, and Vanuatu, primary aim was to, as much as possible, ensure the survival of the economic element, in particular the proposed IMO Fund. The 6PAC+ has consistently supported the need for the transition to be evidence led and based on best available science. All independent analysis has underscored the need for successful implementation to include an economic element, in this case a price on GHG emissions.

Figure 1. 6PAC+ delegations at ISWG-GHG 22 in London.

As set out in the submission of Kiribati et al, the alliance have long preferred a simpler policy solution, a mandatory universal Levy, arguing it provides a greater guarantee of achieving a just and equitable transition with real reductions in absolute emissions than the proposed complex trading scheme.

However, the 6PAC+ also recognizes the importance of achieving a globally enforceable solution. In their submission they offered to compromise - if the NZF 'as is' would be the policy that can achieve consensus and enable the Committee to adopt a mid-term measure at MEPC 85. This appears as the only compromise available that can avoid the grave consequences of failing to reach agreement. The 6PAC+ further noted that it is the absolute limit of their compromise.

The alliance therefore went into ISWG GHG 22 with three clear objectives: a. to push strongly for the adoption of the NZF "as is", b. to resist attempts to re-open or split the NZF, and c. to advance work on the Fund guidelines for managing and disbursement of revenues.

In this regard, the 6PAC+ was successful in its overall aim – the economic element has not been eliminated as sought in the more conservative proposals and remains on the negotiating table for MEPC 85. The NZF "as is" can still be adopted, suggestions to split the NZF were successfully resisted and the work on the Fund guidelines was advanced.

[1]https://www.imo.org/en/mediacentre/hottopics/pages/reducing-greenhouse-gas-emissions-from-ships.aspx
[2]https://mcstrmi.org/wp-content/uploads/2024/09/Corbett-et-al-2020-Climate-Governance-Policy-Entreprenuers-at-the-IMO.pdf
[3]IMO (2023) Strategy on Reduction of GHG Emissions from Ships

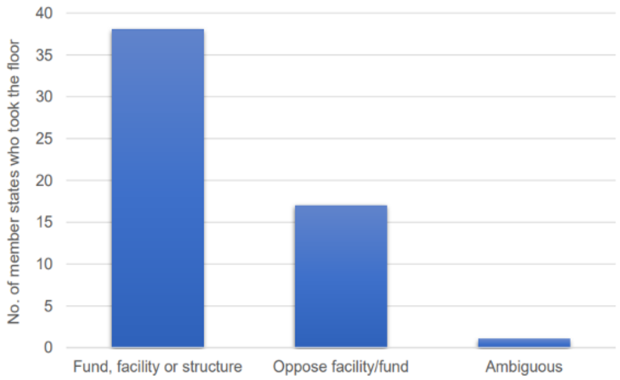

Figure 2. Levels of support for and against the Fund/economic element.

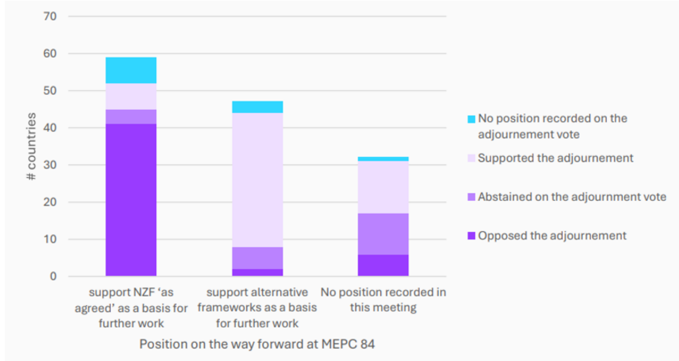

Figure 3. Positions on the way forward at MEPC 84 vs the adjournment vote at ES.2.

3. Preliminary observations on ISWG GHG 22 outcomes

Despite the advances made by the 6PAC+ on achieving our goals for this meeting, a myriad of uncertainties still remain before a final outcome can be considered securable in November/December. However, a number of broad-stroke observations on the likelihood of key factors necessary for a sustainable solution may be made.

Firstly, the likelihood of having a Fund/Facility forming part of the final Framework has increased. There was extensive support demonstrated for the inclusion of a Fund/Facility with revenue disbursement, despite vocal opposition.

However, at the same time, the likelihood of convergence on reaching agreement on the Framework by consensus has decreased. Member States supporting the Saudi Arabia/ US position expressed hard redlines on the inclusion of a pricing mechanism, together with an IMO-managed Fund, in the final Framework. The direct opposite redlines were expressed by several other Member States (including 6PAC+) who still insist the achievement of the goals and objectives of the 2023 IMO Strategy requires both a technical and an economic element.

The likelihood of delayed implementation timelines beyond 2028 has increased. In addition to the substantial divergences that are unlikely to be resolved this year, the ISWG-GHG 22 report notes that the work on the development of guidelines to ensure the effective and uniform implementation of the Net-Zero Framework, are subject to the development and finalization of the MARPOL Annex VI Amendments. This means that potentially, the guidelines workstream must restart.

The likelihood of adopting the Net-Zero Framework as an approved package has decreased. Many delegations who, up to this point supported the adoption of the NZF "as is", expressed openness to considering adjustments to the Framework in order to address any concerns raised by Member States.

The likelihood of the final Framework achieving the goals and objectives of the Revised Strategy has decreased. Given the current negotiating landscape and noting that a landing-zone of a final solution would tend towards the middle ground, the current assessment of that landing zone would be unlikely to achieve the goals and objectives of the Revised Strategy in any meaningful way. Critically, it is now extremely difficult to see how any further delay can allow the 2030 reduction checkpoints agreed in the IMO 2023 Strategy to be met[4]

4. Regional Positions

MEPC 84 was marked by the rapid shift in position from a clear majority of member States in agreement on hard text for the Net-Zero Framework for inclusion in a MARPOL amendment to a yearlong adjournment on a decision being made. Figure 3 shows the position of the actively engaged countries at MEPC84 on whether that text should be maintained or re-opened to potentially accommodate additional alternative proposals.

It was observed at ISWG GHG 22 that the landscape of country positions has shifted minimally since MEPC 84, although a greater clarity on some regional positions was discernable:

- **Africa:** As to be expected from such a diverse continent, divergence of viewpoints persists within the African region. Whilst a growing number of voices have reiterated the concern of impacts on African countries of an emissions pricing and revenue-generating mechanism, those countries requiring a Fund to be part of the final package have also increased.
  Liberia, partnering with Panama and Argentina, continues to push strongly for a measure based on an assessment of 'Availability, Affordability and Scalability of Sustainable Fuels' and which does not apply penalties payable into a Fund. Although almost all African countries which spoke expressed the need for an assessment based on Liberia's criteria, many of these also reiterated the need for a Fund overall.
- **Caribbean:** The obvious continuing pressure both from the USA administration and their own shipping private sector since MEPC 83 has had a clear impact and Caribbean countries did not contribute to the discussions in any meaningful way. In marked contrast to previous engagements, the absence of an agreed regional position was notable and the usually effective coordination of the Caribbean group at the IMO was absent.
- **Pacific:** While the 6PAC+ has maintained its unified and high ambition aspect, the Cook Islands and Samoa continue to advance separate positions to the rest of the region. Their divergent position includes allowing exemptions for Pacific Island countries, rejecting a revenue-generating mechanism, and disagreeing on how to address Disproportionately Negative Impacts on States (ex-ante or ex-post).
  Papua New Guinea and New Zealand have been absent from the recent negotiations whilst Australia has spoken strongly in support of 6PAC core positioning, which is to be expected given Australia's co-hosting of the upcoming COP31.
- **Europe:** Coordination in the European Union on a common position appears to have collapsed. Greece, Malta, Italy, and Cyprus have all declared separate positions to the rest of the group (but short of supporting the Liberia and Japan proposal itself). This divergence within the EU is likely to persist and could impact the intensity with which the EU would support or oppose proposals in the future. In the absence of a common position, the EU Commission would make the final decision, which could lean towards a more moderate ambition overall. The EU is highly likely to accept further compromises in the

[4]The 2023 IMO Strategy set checkpoints for absolute sector GHG emissions reduction in 2030 (20 percent, striving for 30 percent) and 2040 (70 percent, striving for 80 percent) with full decarbonization achieved by or around 2050.

interest of achieving a measure by consensus.

- **Asia:** Divergent positions persist in Asia, as they have done throughout the history of these negotiations. Whilst India and Thailand now support the position of Saudi Arabia/USA, Indonesia and Malaysia have moved towards a Framework which contains an economic element. Although Japan supports the NZF "as is", they are willing to entertain proposals that would address concerns and are therefore likely to compromise further in the interest of consensus. Singapore has expressed support for the proposal of Japan submitted in document MEPC 85/7/3 which has otherwise received little direct support. China is willing to support whichever measure the Committee comes to a consensus on but it is unlikely to support a Framework which does not have extensive support. China does however remain engaged in the development of guidelines.
- **Latin America:**Positions vary, although the majority of LATAM countries which spoke (excepting Chile and Mexico) supported the proposal of Liberia and Panama (22/2/9 etc.)
- **Middle East / North Africa:** The MENA region was extremely well coordinated with Saudi Arabia at the helm. They remain obstinate on having a measure which does not include penalties which are payable into a Fund. UAE, although supporting the overall MENA position, diverged on technical details on the design of the measure, proposing rather a measure which had high environmental integrity relative to the Saudi proposal.
- **USA:** The USA continues to oppose the NZF and were vocal at ISWG GHG 22 in supporting a market-determined position without mandatory pricing. The USA did express some openness, however minimal, to considering a Facility-style proposal as opposed to a centrally managed Fund.

5. What is the way ahead for 6PAC+?

It continues to be essential the Pacific region to be heard on the discussions relevant to reduction on GHG emissions from ships due to the high risk that we would be left behind in the transition to Net-Zero. The deepening climate crisis continues to pose an increasing existential threat. With the 1.5 degree C limit now subject to overshoot, eliminating all global GHG emissions is even more urgent, every 1/10th of a degree matters.

The period between ISWG-GHG 22 and MEPC 85 will be extremely critical. While there is still no confirmation that the Extraordinary Session of MEPC will be reconvened in December following the Committee's 85th meeting, it must be assumed that a majority of Members are committed in good faith to finding a pathway to resolution of agreement on MARPOL text this year in order to maintain the integrity of the IMO's 2023 Strategy and ensure IMO's relevance as the global regulator. Any further delay will make the 2030 checkpoints unachievable.

The Working Group invited Member States to work together intersessionally to achieve as much convergence as possible. In addition to the existing informal group discussions the 6PAC+ contributes to, a new 'Convergence Group' including all sides of the negotiating table has been formed in an attempt to find a landing zone between all parties. This group includes the US, Saudi Arabia and MENA, Panama and Liberia, members of the Net Zero Friends group, and members from the African, Caribbean and Pacific grouping.

It is important for 6PAC+ to continue to participate in these discussions in order to maintain the highest possible ambition and to achieve, as much as possible, commitment to a Just and Equitable Transition. Ongoing participation for micro-Pacific States on the far side of the globe from London remains challenging to the capacity of delegations and the budgets of Capitols to maintain.

ANNEX: 6PAC+ Responses to Agenda Items

ISWG GHG 22 AGENDA:

1. Adoption of the agenda
2. 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 Net-Zero Framework, in line with the 2023 IMO GHG Strategy
3. Further consideration of the draft guidelines supporting the uniform and effective implementation of IMO's mid-term measures
4. Further consideration of the development of the IMO Life Cycle GHG Assessment (LCA) framework
5. Any other business
6. Consideration of the report to MEPC 85

Agenda Item 2: Legal Amendments

Part 1: GHG fuel intensity (GFI) calculation, reporting, verification and certification requirements

The 6PAC+ did not support China's proposed adjusted GFI formula. Key points raised:

- The current fuel-by-fuel formulation offers greater certainty for industry than the proposed adjustment.
- Moving substantive calculation elements into the (more easily amendable) implementing guidelines risks undermining clarity on industry incentives.
- The removal of the reference to the IMO LCA Guidelines could not be supported, since this reference provides clarification for industry that should remain in the regulatory text rather than being delegated to guidelines.

The 6PAC+ position was that most remaining issues can be resolved through the guidelines, but only on the condition that one point is settled now in the draft MARPOL Annex text itself: that there is a clear and fixed one-to-one relationship between a Surplus Unit credit and one tonne of GHG emissions. 6PAC+ flagged this as something to lock down at this stage to avoid having to revisit it later.

- GFI architecture — General support for the underlying GFI calculation, reporting, and verification architecture, built on the GFI formula, LCA, Sustainable Fuel Certification Schemes (SFCS), and the IMO GFI Registry.
- Totality needed — The draft Framework's components are being discussed separately but will need to fit together as a whole by the end of the process, ultimately expressed as legal text supported by guidelines.
- Openness to the adjusted GFI formula — There was willingness in the Group to take forward the adjustments to the GFI formula proposed in ISWG-GHG 22/2 as a basis for draft MARPOL Annex VI regulations, provided the framework's integrity is preserved and an explicit reference to the 2024 LCA Guidelines stays in the legal text.
- OCCS placement undecided — Both options remain open — referencing onboard carbon capture and storage (OCCS) in the legal text itself or addressing it in guidelines — with no delegation opposed to OCCS in principle as an emissions-reduction option.
- OCCS framework not yet ready — Completion of the OCCS framework, still under development in the correspondence group, would be required in any case before OCCS could be applied for compliance purposes.

Part 2: GFI Reduction Pathway

The 6PAC+ opposed softening the GFI curve as proposed by Japan and Brazil, arguing it wouldn't lower transition costs and would delay both investment and Tier 1 revenue. The 6PAC+ supported Tuvalu's simpler alternative adjustment to the direct compliance GFI instead. The 6PAC+ backed keeping the 2040 target and the current gradual stringency curve, warning that Brazil's approach (soften now, raise later) would be more disruptive, and opposed dropping the direct compliance trajectory since it underpins stable RU revenue.

On Liberia's proposal, the 6PAC+ stated it would add uncertainty and investment risk, backed Norway's view that the "Commercially Viable Fuel" definition is legally unworkable, and noted it would scrap the Fund entirely — removing support for vulnerable countries.

On monitoring, the 6PAC+ supported keeping the GFI tied to the 2023 IMO GHG Strategy, with ongoing assessment of fuel availability/scalability to guide RU pricing and ZNZ rewards and welcomed the existing future fuels work and MEPC 80 study as useful inputs.

<u>Discussion outcome:</u>
The Chair noted that many delegations showed willingness to compromise, drawing on merits from other proposals during a productive discussion. Based on that discussion, the Chair suggested three possible ways forward on adjusting the GFI reduction targets:

1. A softer start, to safeguard reliable shipping service to global trade;
2. Predictability over a defined time horizon, bending the curve to enable and sustain needed investments; and
3. Ability to assess and adjust as appropriate, while maintaining the framework's reliability.

Part 3: GFI Compliance Approaches

The 6PAC+ backed on-board reductions and fleet averaging (via a high-integrity GFI Registry), and accepted RU1/RU2 revenue use per the approved NZF — but rejected Japan's Direct Contribution Scheme as lacking integrity safeguards and risking the framework overall.

Regarding surplus units, the 6PAC+ preferred removing SU trading entirely (Tuvalu's approach), but if retained, insisted on strict conditions: 1:1 unit-to-tonne basis, no multipliers, registry oversight, no extended banking, and Tier 2-only use.

The 6PAC+ rejected linking SU supply to energy efficiency metrics (poor measurability/transparency), though saw some value in applying mid-term measure concepts separately to the short-term measure review.

The 6PAC+ opposed netting (China's proposal), as it would preempt the Fund governance process role in balancing ZNZ rewards against JET investment.

<u>Discussion Outcome:</u>
The Chair proposed retaining all four compliance options as a basis for further convergence, with options 1 and 2 fully accepted and options 3 and 4 needing further work:

1. On-board emission reductions;
2. Fleet-wide reductions, including through pooling;
3. Reductions (direct or implicit) via financial contributions to a Fund/Facility; and
4. Direct contributions to an Organization - approved project under the "Direct Contribution Scheme".

The Chair encouraged delegations to keep exploring convergence, including further developing proposals that add flexibility for the shipping industry while supporting effective implementation of the Framework.

Part 4: Establishment of a Fund/Facility

The 6PAC+ backed keeping the term "Fund" and central Board - managed revenue, noting IMO financial regulations already provide a clear pathway. The 6PAC+ accepted voluntary contributions but only as a supplement — not a substitute — for reliable GFI/RU-based revenue, and opposed direct contributions, as proposed by Japan, since they would shift control to private companies over a Member State driven Board. On a level playing-field without a Fund, the 6PAC+ said this is essentially unachievable: only a Fund can distribute revenue to protect address DNI and support a just and equitable transition, consistent with the 2023 IMO GHG Strategy and international equity obligations.

Discussion Outcome:
During discussion, delegations put forward several further approaches for consideration:

1. A transaction fee on transfers within the compliance mechanism;
2. A port-based incentive model, building on MARPOL Annex VI regulation 28.1.10;
3. An experience-building and data-gathering phase to establish actual funding needs;
4. A roster of eligible funds; and
5. A hybrid approach allocating revenues through existing multilateral investment instruments, subject to Committee oversight.

The Chair suggested the Group note these views and invited delegations to further explore how to resolve remaining concerns, including on the role of the Organization and other bodies. The Chair also noted the general view that the mechanism's name matters less than its nature, purpose and functions, and encouraged delegations to keep exploring bridge-building concepts.

Part 5: ZNZ Reward Mechanism

The 6PAC+ reiterated that it does not accept a less ambitious GFI trajectory. On the substantive question, 6PAC+ noted it is widely recognized that a cost-effective shipping transition requires early investment in long-term solutions not yet cost-competitive with alternatives — investment that SU trading alone cannot support. 6PAC+ argued a dedicated reward mechanism remains essential to provide industry certainty and to ensure ZNZ fuel production is incentivized across the Global South, not only in currently advantaged first-mover locations. 6PAC+ proposed that JET-eligible auctions prioritizing reward spending in the Global South would make the mechanism an enabler of inclusive transition, avoiding a scenario where investment flows only to established, dominant maritime nations.

The 6PAC+ opposed the use of a multiplier, arguing it would undermine the integrity of the GFI mechanism and create an unpredictable investment signal. 6PAC+ maintained that only a well-managed Fund, appropriately allocating between ZNZ reward auctions and JET investment, can deliver the goals of the 2023 Strategy — describing this as the sound compromise the NZF already represents and still the most appropriate way forward.

Discussion Outcome:
The Chair suggested that:

1. a dedicated ZNZ incentive be retained in principle at this stage, including through potential financial rewards; and
2. interested delegations will be invited to further explore the ZNZ multiplier proposed in document ISWG-GHG 22/2, including the safeguards needed to preserve environmental integrity and ensure a level playing field.

Final Conclusions

In summing up, the Chair highlighted the Group's outcomes under agenda item 2: reconfirmation of the GFI calculation, reporting and verification architecture; an agreed overall direction for refining the reduction pathway; and agreement to further explore compliance mechanisms. On the most sensitive matter — establishing a Fund or compliance facility — the Group agreed to keep exploring how remaining concerns could be resolved, based on a better mutual understanding of positions.

The Chair noted a genuine willingness within the Group to make further progress at the next meeting, aiming to present a revised text to MEPC 85 that adequately addresses concerns on the draft MARPOL Annex VI amendments for the mid-term measure. However, the Chair observed that a number of issues remain unresolved, and further movement will be needed to achieve full alignment.

The Group invited interested delegations to continue to consult intersessionally to address remaining concerns with the draft amendments to MARPOL Annex VI, in line with the 2023 IMO GHG Strategy, taking into account views expressed at this session, with a view to submitting concrete proposals reflecting enhanced convergence allowing timely adoption and effective implementation.

Agenda Item 3: Guidelines

The Group only had a preliminary exchange of views. Because the Chair could not take the remaining cards due to time constraints, there was no formal conclusion on the outcome of discussions of Agenda Item 3. Despite this, 6PAC+ was able to provide views on all 3 Parts of Agenda Item 3.

Part 1: GHG fuel intensity (GFI) calculation, reporting, verification and certification requirements

The 6PAC+ backed using the ISWG-GHG 22/3/6 annex as the basis for verification guidelines and supported the Energy Consumption Index as a voluntary cross-checking tool via SEEMP amendments, citing Brazil's findings on measurement inconsistencies while staying open to a future mandatory approach.

On SFCS, the 6PAC+ raised strong integrity concerns — fraud/equity risks in mass balance systems, a framework-alignment focus lacking real transition vision, and IMO's limited enforcement reach compared to the EU — urging these be prioritized.

On remaining guideline work, 6PAC+ flagged significant work still needed per the Secretariat's J6 report, prioritized finalizing wind propulsion guidelines (thanking China, Norway, and IWSA), and reaffirmed openness to further collaboration.

Part 2: Draft Fund governing provisions

6PAC+ proposed ISWG-GHG 22/3/13 (with 22/3/14 language incorporated) as the base text for Governing Provisions, while criticizing the lack of adequate attention given to this functional requirement of the NZF, which 6PAC+ tied directly to delivering JET under the 2023 Strategy.

On Question 1, argued JET investment (especially for SIDS/LDCs) can't be industry-directed alone, cited the MEPC 84 INF/10 study as a useful reference, and urged building on the NZF "as is" rather than reopening it.

The 6PAC+ supported free-standing interim arrangements as legally correct (since ungoverned entities can't yet hold powers), suggesting reliance on a Committee decision or the Secretary-General's existing authority — while allowing that provisional text within the governing instrument itself is also workable.

Part 3: Guidelines related to ZNZ definition and rewards, newly proposed regulatory elements, and impacts on States

The 6PAC+ identified several features in the draft ZNZ guidelines that could maximize cost-effectiveness of the reward mechanism — i.e., maximizing ZNZ uptake at least cost to the Fund, which in turn maximizes JET-available revenue and progress toward the Revised Strategy's ZNZ target (5–10 percent energy share by 2030), while improving future fuel availability and affordability.

Key features cited:

- Differentiation — reward rates should reflect that different ZNZ fuels/feedstocks have different price points and trajectories (per the IMO Comprehensive Impact Assessment, Task 2), to avoid over-rewarding short-term solutions and under-supporting long-term ones.
- Reverse auctions from the outset — preferred over flat government-set rates, which 6PAC+ argued create rent-seeking risk (as Brazil noted) and undermine Fund predictability (e.g., via discount mechanisms or China's carry-forward proposal); reverse auctions use competitive market processes to set cost-effective reward rates.
- JET-eligible ZNZ rewards — reward mechanisms should be designed to ensure rewards flow to developing countries and support genuine inclusivity.

The 6PAC+ opposed guidelines on "essential goods," citing the need for an inclusive transition without exemptions that could disadvantage developing nations. The 6PAC+ also opposed guidelines on "commercially viable fuels," arguing market viability is a market function, not a matter for technology-neutral, goal-based regulation. The 6PAC+ rejected pursuing "direct contribution" guidelines, noting this concept's shortcomings have been extensively discussed and broadly rejected, making further guideline development inconsistent with recent consensus.

The 6PAC+ supported further work on both elements, advocating development of methods to monitor food security impacts of IMO GHG policies alongside ongoing review of other negative impacts. 6PAC+ welcomed the DRC/MOENSA submission (22/3/11) and stressed that clear DNI definitions are essential for fund governance to fulfill Regulation 41 and support JET. The 6PAC+ offered to work intersessionally with co-sponsors and other members to advance this work.