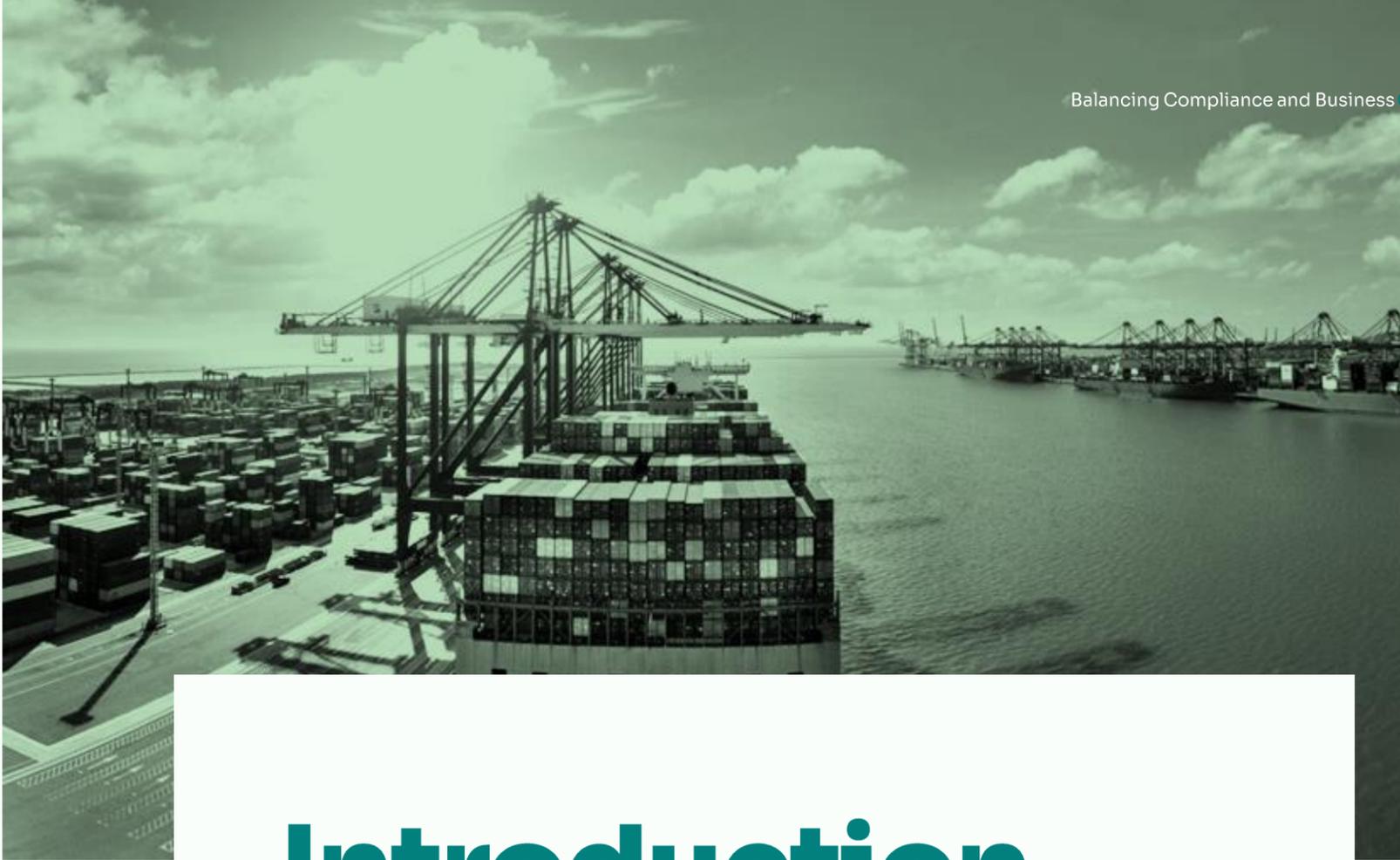




# **Cutting Carbon at Sea: A Review of Nigeria's Commitment to the International Maritime Organization (IMO) Net Zero Framework**

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# Introduction

The global maritime industry is at a critical juncture, as the urgency to reduce greenhouse gas emissions has reached unprecedented levels.

In response, the International Maritime Organization (IMO) has introduced a series of ambitious measures to address the environmental impact of international shipping. Chief among these is its landmark strategy adopted by the IMO in 2018, which sets a long-term goal of achieving net-zero emissions from international shipping by 2050 and would bring about transformative changes in how ships are powered and operated.<sup>1</sup> This strategy is central to transitioning from traditional fossil fuels, like heavy fuel oil, to alternative, cleaner energy sources. Equally important are measures to enhance energy efficiency on vessels, promote carbon pricing mechanisms, and establish green shipping corridors that facilitate sustainable infrastructure deployment across key global ports. For countries like Nigeria, a major player in Africa's maritime economy, and a key link in global shipping networks, aligning with this global framework presents both notable difficulties and vast opportunities for players within the industry. Nigeria's strategic location along critical trade routes, combined with its reliance on maritime trade, makes its role in this global transition especially important.

This article examines the IMO Net Zero framework, particularly highlighting the steps taken, the challenges faced, and the opportunities that await international players within the Nigerian Maritime industry

# The IMO Net Zero Framework: A Global Overview

The IMO's Net Zero framework in its entirety represents a major shift towards sustainable shipping practices. The organization has outlined specific measures that member states must adopt,<sup>2</sup> including but not limited to:

- The Adoption of alternative fuels such as hydrogen, ammonia, biofuels, and methanol to replace traditional fossil fuels like heavy fuel oil.
- Increased energy efficiency of ships, including retrofitting older vessels with energy-saving technologies and designing new ships with better energy performance.
- Carbon pricing and market-based mechanisms to incentivize the reduction of emissions within the global shipping industry.
- Development of green shipping corridors that facilitate the deployment of sustainable infrastructure in major ports around the world.

The strategic framework established by the IMO calls for comprehensive action at both the national and international levels, presenting all member countries with the responsibility to formulate their own approach and implementation models tailored to their unique maritime industry.

## Nigeria's Commitments Towards IMO Net Zero Targets

Nigeria, as one of Africa's leading maritime hubs and a key player in international shipping, is significantly impacted by these regulations. As a member of the IMO, Nigeria recognizes the necessity of meeting its pledges towards sustainable development. Nigeria's

maritime sector, governed by bodies such as the Nigerian Maritime Administration and Safety Agency (NIMASA) and the Nigerian Ports Authority (NPA), is deeply intertwined with the global shipping industry. Given its geographical position along major

international shipping routes and its reliance on maritime trade, compliance with IMO regulations is both a challenge and an opportunity.

Furthermore, the Nigerian government has ratified key international conventions related to environmental protection in the maritime sector, including the International Convention for the Prevention of Pollution from Ships (MARPOL), which plays a critical role in controlling and reducing ship emissions. However, the actualization of Nigeria's commitment to IMO Net Zero requires consistent policy implementation and substantial investments in green maritime technologies. Over the years, the Federal Government, its maritime agencies, and key stakeholders within the maritime industry have taken major steps towards compliance with the IMO Net Zero targets. The MV Great Lagos, a vessel equipped with technology to reduce carbon emissions by up to 43% per transported tonne, was berthed and christened at the Ports and Terminal Multiservice Limited (PTML), Tin-Can Island Port, Lagos State last year. This event highlighted Nigeria's commitment to the 2023 International Maritime Organization's (IMO) Greenhouse Gas (GHG) Strategy, which

aims to reduce the carbon intensity of international shipping by at least 40% by 2030.<sup>3</sup> These efforts signal the country's readiness to meet IMO's targets.

Additionally, NIMASA issued a Marine Notice (MN 09/21/SN02) to Ship Owners and Maritime Stakeholders<sup>4</sup> in line with its powers to protect the Marine Environment under the Merchant Shipping Act 2007,<sup>5</sup> under the enabling Act of the Agency;<sup>6</sup> notifying all parties concerned of the full implementation and enforcement of MARPOL PROTOCOL-Annex VI)<sup>7</sup> to limit the Sulphur content of any fuel used on board Nigerian Flagged vessels or on any vessel operating in Nigeria's territorial waters.<sup>8</sup>

Despite the absence of a fully developed maritime decarbonization framework, Nigeria has made notable progress in broader environmental and climate policies, which lay the groundwork for future shipping regulations. Nigeria's commitment to reducing carbon emissions is evident through initiatives like the above-mentioned Marine Notice issued by NIMASA, Nigerian Climate Change Act of

2021 and establishment of the National Carbon Market, with the Ministry of Environment.<sup>9</sup> These frameworks, outlines a roadmap for the development of a national carbon market, including the establishment of a carbon registry, emission reduction projects, and trading mechanisms. The frameworks are expected to attract investments in clean energy and energy efficiency projects by ship owners.<sup>10</sup>

Nigeria's alignment with the Paris Agreement and its Energy Transition Plan (ETP) also provide essential context for its maritime decarbonization efforts. As a signatory to the Paris Agreement, Nigeria has committed to reducing its greenhouse gas emissions by 20% unconditionally and 47% conditionally by 2030. The Energy Transition Plan, launched in 2022, outlines the country's roadmap to achieve net-zero emissions by 2060, with a strong emphasis on energy diversification, technological innovation, and sector-specific decarbonization.

While the plan primarily targets power, oil and gas, and transport, its overarching principles, including cleaner fuel adoption and international collaboration, are equally relevant for the maritime sector. Integrating the maritime industry into the ETP's implementation framework could fast-track regulatory alignment and unlock

climate finance for green shipping investments. These broader environmental policies are expected to influence Nigeria's approach to decarbonizing its maritime sector. Furthermore, Nigeria's involvement in regional bodies like the Maritime Organization of West and Central Africa (MOWCA) highlights its leadership role in promoting sustainable

shipping practices across the region. These efforts suggest that, while Nigeria's maritime decarbonization framework is still in its early stages, the groundwork for future regulations is steadily being laid. Thus, the country's active participation in the IMO targets reflects a willingness to adapt to the shifting regulatory landscape.

## Opportunities for Shipping Companies Operating in Nigeria

While Nigeria's policies on shipping decarbonization are still in development, the evolving regulatory landscape presents significant opportunities for international shipping companies operating in or intending to enter the Nigerian market. By proactively adopting alternative fuels, such as liquefied natural gas (LNG), hydrogen, and ammonia, and integrating energy-efficient technologies into their operations, shipping companies can gain a competitive advantage. These early adopters stand to benefit from potential regulatory incentives and position themselves as leaders in sustainable maritime

practices.

Additionally, Nigeria's growing maritime sector offers significant commercial opportunities, particularly for companies willing to invest in green shipping solutions. Companies that lead the charge in sustainability can shape the future regulatory framework in Nigeria and the broader West African region, ensuring that their investments today yield long-term benefits as the country advances toward full compliance with global decarbonization standards.

More so, shipping companies that make early investments in alternative fuels and

energy-efficient technologies can establish a competitive advantage in the Nigerian maritime industry. The International Maritime Organization (IMO) framework promotes the adoption of low-carbon and zero-carbon fuel alternatives, such as hydrogen, ammonia, biofuels, and methanol, to replace traditional heavy fuel oil. Companies at the forefront of this transition will not only ensure compliance with future regulations but also stand to benefit from potential cost reductions stemming from lower fuel consumption and increased energy efficiency.

# Recommendations for Strengthening Nigeria's Maritime Decarbonization Strategy.

## Develop a Comprehensive Maritime Decarbonization Framework:

It is important that Nigeria establishes a dedicated national policy that addresses the decarbonization of its maritime sector. This framework should go beyond general environmental commitments and lay out clear, enforceable targets for emissions reduction within the shipping industry. It should include specific provisions for the transition from fossil fuels to low- and zero-carbon alternatives, timelines for implementation, and guidance for retrofitting existing vessels. A structured approach will provide the regulatory certainty needed to attract investment and ensure industry-wide compliance with global standards.

## Integrate the Maritime Sector into National Climate and Energy Policies:

Although the IMO provides a comprehensive framework for reducing emissions from international shipping, Nigeria's national climate and energy policies, such as the Energy Transition Plan (ETP) and its Nationally Determined Contributions (NDCs), are yet to explicitly reflect these maritime commitments. The focus of these policies has largely been on sectors like power, transport, and oil and gas, with limited reference to shipping. For a truly coordinated climate response, policymakers should ensure that maritime decarbonization goals are clearly embedded within national strategies. This would not only support the implementation of IMO targets domestically but also position Nigeria to attract international climate finance for port and shipping-related projects, including through carbon credits and green bonds.

## Strengthen Monitoring, Reporting, and Enforcement Mechanisms:

Effective enforcement is critical to the success of any regulatory framework. Nigeria should develop a maritime emissions monitoring system, supported by digital tools for data collection and real-time reporting. Regulatory agencies like NIMASA must be equipped with the technical and institutional capacity to conduct inspections, verify compliance, and impose penalties for violations. A centralized emissions inventory should also be created to track national progress and build transparency in line with global expectations. Without robust monitoring and enforcement, policy intentions risk remaining purely aspirational.

## **Introduce Incentives and Green Financing Structures:**

To drive early adoption of clean technologies, regulators should introduce financial incentives for shipping companies investing in energy-efficient vessels and emissions-reduction upgrades. These could include tax holidays, duty waivers on green equipment, or rebates for carbon-reducing investments. In addition, the government can collaborate with development finance institutions and climate funds to create dedicated financing vehicles for maritime decarbonization. This would help de-risk investment and make it easier for local operators to transition without financial strain.

## **Designate and Develop Green Shipping Corridors:**

Nigeria should take a proactive role in creating regional green shipping corridors,<sup>11</sup> beginning with strategic trade routes such as Lagos–Tema or Lagos–Abidjan. These corridors would act as testing grounds for sustainable maritime infrastructure, including the use of alternative fuels, port electrification, and shore-to-ship power. By partnering with other West African nations and international organizations, Nigeria can position itself as a hub for low-carbon shipping and attract significant foreign investment in port modernization and infrastructure development.

## **Roll Out Sector-Wide Capacity Building and Awareness Campaigns:**

A successful transition requires more than policies; it needs informed and engaged stakeholders. Government and maritime agencies should invest in continuous capacity building for shipowners, operators, regulators, and seafarers on emissions regulations, energy efficiency technologies, and fuel alternatives. Awareness campaigns should also be launched to highlight the benefits of sustainable shipping, build public support, and ensure that all actors from vessel owners to port managers, understand their roles in achieving national and international climate targets.

## Outlook

As the global shipping industry moves toward decarbonization, Nigeria will need to align its policies with IMO standards. The development of a robust regulatory framework for shipping decarbonization is expected to follow Nigeria's broader environmental commitments, offering a clear path for the maritime sector to

contribute to the country's climate goals. Secondly, Shipping companies operating within Nigeria are to anticipate these changes and prepare to implement IMO-compliant practices in order to remain competitive. In addition to ongoing environmental initiatives, discussions within Nigeria's legislative bodies about

reducing carbon emissions, particularly in energy-intensive industries, indicate that more targeted maritime regulations will soon emerge. These legislative efforts, combined with Nigeria's commitment to the IMO's goals, position the country as a key player in shaping the future of green shipping.

## Conclusion

For shipping companies, Nigeria offers a dual advantage: a growing market with strategic positioning along critical global trade routes and a commitment to aligning with international environmental standards. Early adopters of green technologies and alternative fuels will stand at the forefront of this transition, benefiting from regulatory incentives,

operational efficiencies, and long-term competitive advantage. However, companies that fail to anticipate these changes risk being left behind in an increasingly regulated global shipping industry. As Nigeria continues to solidify its role as a regional leader in sustainable maritime practices, players within the industry have the chance to partner in shaping this future. By investing in Nigeria's

maritime sector, whether through technology, expertise, or sustainability solutions, these companies can secure their place in a rapidly evolving regulatory landscape. This endeavour is not only a national imperative but also a regional and global one, and those contributing to this vision today will lead tomorrow's sustainable shipping industry.

# Endnote

1. International Maritime Organization 'IMO', 2018 Initial IMO Strategy, <https://www.imo.org/en/OurWork/Environment/Pages/Vision-and-level-of-ambition-of-the-Initial-IMO-Strategy.aspx#:~:text=The%20revised%20IMO%20GHG%20Strategy,details%20can%20be%20found%20here>. Accessed on 10th October, 2024.
2. International Maritime Organization, 'IMO makes progress on net-zero framework for shipping' (8 October 2024) Available at <https://www.imo.org/en/MediaCentre/PressBriefings/pages/MEPC-82-makes-progress-IMO-netzero-framework.aspx> accessed 8th October 2024
3. Leadership, 'Lagos Port Receives World Largest Container RORO Vessel', [https://leadership.ng/lagos-port-receives-world-largest-container-roro-vessel/#:~:text=%E2%80%9CThe%20very%20fact%20that%20this,International%20Maritime%20Organization's%20\(IMO\)%20GreenHouse](https://leadership.ng/lagos-port-receives-world-largest-container-roro-vessel/#:~:text=%E2%80%9CThe%20very%20fact%20that%20this,International%20Maritime%20Organization's%20(IMO)%20GreenHouse) Accessed on 10th October, 2024.
4. Maritime Stakeholders includes: Ship Owners, Managers, Charterers, Shipping Companies, International Oil Companies (IOC's), Ship Operators, Ship Masters, Captains, Agents, Offshore Installations And Platforms, Officers Of Merchant Ships, Bunker And Fuel Oil Suppliers, Maritime Stakeholders And The Public
5. Section 335 and 336.
6. Section 22 and 58 of the Nigerian Maritime Administration and Safety Agency Act 2007
7. Regulations 14, 18(5) & (6), 22 (a)
8. Nigerian Maritime Administration and Safety Agency, 'Marine Notice – MN 09/21/SN02' (NIMASA, 2021) Available at <https://nimasa.gov.ng/wp-content/uploads/2021/09/MARINE-NOTICE---MN-0921SN02.pdf> accessed 9 October 2024.
9. Vanguard News, 'Nigeria Joins Global Shift Towards Carbon Markets to Combat Climate Change' (1 July 2024) Available at <https://www.vanguardngr.com/2024/07/nigeria-joins-global-shift-towards-carbon-markets-to-combat-climate-change/> accessed 9 October 2024.
10. Ibid.
11. Green shipping corridors are specific maritime routes between two or more ports where ships use low- or zero-emission fuels, supported by coordinated efforts to provide the necessary infrastructure, regulations, and technologies for cleaner shipping. These corridors serve as pilot zones for decarbonization, allowing countries and companies to test and scale sustainable shipping practices along targeted trade routes.

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## The Authors



**Joseph  
Siyaidon**

Team Lead

Franciscalgboanugo  
@strenandblan.com



**Stanley  
Umezuruike**

Associate

OmobilajjiBello  
@strenandblan.com



**Oghenemega  
Igbru**

Associate

OghenemegaIgbru  
@strenandblan.com



# Stren & Blan Partners

www.strenandblan.com  
contact@strenandblan.com  
@strenandblan

+234 (0)702 558 0053  
3 Theophilus Orji Street, Off Fola Osibo Road,  
Lekki Phase 1, Lagos, Nigeria