



SHIPOWNER'S COMPLIANCE CLOCK

Key Regulatory Dates, Fleet Actions & Planning Milestones — 2026–2030

Generic quick reference for all shipowners/fleet managers, regardless of flag or vessel type. Always verify applicability against flag, ship type, GT, trading area and current IMO/EU/UK requirements before acting. Items marked **SCENARIO** are not yet adopted / not yet in force.

LAST UPDATED
18 AUG 2026

2026

COMPLY NOW

- **EU ETS:** 70% surrender for 2025 emissions due 30 Sep; 100% applies from 2026 emissions.
- **FuelEU:** 1st reporting cycle: 31 Jan report → 30 Jun DoC/penalty.
- **SOLAS/MARPOL:** lost-container reporting + STCW violence/harassment training in force (1 Jan).
- **2 new ECAs** live 1 Mar (Canadian Arctic, Norwegian Sea).
- **UK ETS** live 1 Jul — UK domestic voyages & in-port emissions only.
- **SCENARIO — NZF:** adoption decision expected late 2026, after 2025 session adjourned 57–49 — not yet adopted.

2027

PREPARE / TRANSITION

- **EU ETS** extends to offshore ships ≥5,000 GT (1 Jan).
- **UK ETS:** offshore ships enter scope (1 Jan).
- **IMSBC Code Amdt 08-25** becomes mandatory (1 Jan).
- **Polar Code ch.9-1/11-1** applies to existing ships built before 1 Jan 2026.
- **SOx 0.10%** enforcement begins in 2026 ECAs; 12-mo grace ends (1 Mar).
- **SCENARIO — NZF:** if adopted late 2026, earliest EIF is ~1 Mar 2028 — not 2027.

2028

MONITOR

- **SCENARIO — NZF:** earliest possible entry into force (~1 Mar), only if adopted late 2026 — still not law today.
- **UK ETS:** first (double) surrender for 2026+2027 scheme years due 30 Apr.
- **EU ETS** linear reduction factor rises to 4.4%/yr (from 4.3%).
- **UK ETS** 5,000 GT threshold & exemptions reviewed.

2029

LONGER-TERM PLANNING

- **SCENARIO — NZF:** possible first full compliance year, subject to 2026 adoption outcome.
- **FuelEU** GHG-intensity trajectory continues to tighten toward 2030 milestone.
- Continue monitoring **EU/UK ETS** cap trajectories toward 2030 targets.

2030

LONGER-TERM PLANNING

- **FuelEU zero-emission-at-berth/OPS** requirement begins (1 Jan) for in-scope container & passenger ships at AFIR-covered EU ports.
- **FuelEU GHG-intensity target** reaches ~6% vs 2020 baseline.
- **Fleet planning:** assess 2030 fuel, propulsion, efficiency & port-infrastructure exposure.

WHAT DOES THIS MEAN FOR MY FLEET?

Regulation / Regime	Applies To	Key Date(s)	Status	Fleet Action
EU ETS (Maritime)	Cargo/passenger ≥5,000 GT; offshore ≥5,000 GT from 2027	30 Sep annually — 2026: 70% (2025 emissions); 100% from 2026 emissions, first due 30 Sep 2027	IN FORCE	Verify MRV data; note 100%/50% split (intra-EU vs EU–non-EU); confirm who pays.
FuelEU Maritime	Commercial ships >5,000 GT calling EU ports, any flag (Norway/Iceland: 3rd-country status)	31 Jan report · 31 Mar verify · 30 Apr balance · 30 Jun DoC/penalty (annual)	IN FORCE	Track GHG intensity; pool/bank/borrow; penalty is formula-based (€2,400/t VLSFO–eq deficit).
UK ETS (Maritime)	≥5,000 GT, UK domestic voyages & in-port emissions; offshore from 2027. International voyages not yet in scope (possible 2028)	1st year: 1 Jul–31 Dec 2026 · Report 31 Mar 2027 · 1st (double) surrender 2026+27: 30 Apr 2028	REGIONAL	Track separately from EU ETS; watch international-voyage consultation.
IMO CII / EEXI / SEEMP	CII: ships ≥5,000 GT · EEXI: applicable existing ships	Annual CII rating; EEXI ongoing	IN FORCE	Monitor rating trend; corrective action plan where required.
MARPOL Annex VI — ECAs	Ships transiting designated Emission Control Areas	Canadian Arctic & Norwegian Sea in force 1 Mar 2026; SOx enforcement 1 Mar 2027	IN FORCE	Confirm fuel-switching procedures & charts updated for new ECAs.
SOLAS/MARPOL — Mandatory Lost-Container Reporting	All ships	In force 1 Jan 2026	IN FORCE	Update SMS & master's reporting procedures.
STCW — Violence & Harassment Training	Seafarers (STCW Code Table A-VI/1-4)	In force 1 Jan 2026	IN FORCE	Update onboarding & refresher training records.
SOLAS — Electronic Inclometers	Container & bulk carriers ≥3,000 GT constructed on/after 1 Jan 2026	In force 1 Jan 2026	IN FORCE	Confirm applicability at newbuild specification & certification.
IMSBC Code (Amdt 08-25)	Ships carrying solid bulk cargoes	Voluntary from 1 Jan 2026; mandatory 1 Jan 2027	ADOPTED	Update cargo manuals & loading procedures ahead of 2027.
Polar Code (Ch.9-1 / 11-1)	Fishing ≥24 m; yachts ≥300 GT non-trade; cargo ships 300–<500 GT in polar waters	New ships: 1 Jan 2026 · Existing ships: 1 Jan 2027	IN FORCE	Confirm structural/equipment compliance by deadline.
IMO Net-Zero Framework (NZF)	Ships ≥5,000 GT, global, all flags — if adopted	Adoption decision expected late 2026 (2025 session adjourned 57–49); earliest EIF ~1 Mar 2028 if adopted	SCENARIO	Monitor late-2026 outcome; don't commit capex on assumed dates.
Ballast Water Management (BWM) Convention	Ships within scope	Ongoing — survey-linked	IN FORCE	Maintain BWMS records & align renewal with survey cycle.

⚠ DON'T MISS

- **Applicability:** in-force ≠ automatically applicable — check GT, type, trading area.
- **Flag vs. trading area:** EU/UK-regional rules can apply to any flag calling those ports.
- **Reporting date ≠ compliance date:** a filed report doesn't mean the obligation is met.
- **Verifier/RO lead time:** book early — capacity is tight around annual deadlines.
- **Dry-dock integration:** align EEXI/BWMS/inclinometer work with next docking.
- **EU vs UK ETS:** separate schemes, different scope & dates — don't conflate.
- **NZF is not law:** plan scenarios, not fixed budgets or dates.

FLEET DATA TO KEEP CURRENT

IMO No. · Flag · Ship type · GT/DWT · Year built
Engine configuration · Fuel type(s)
EEXI status · CII rating & trajectory · SEEMP status
EU/UK ETS & FuelEU applicability, trading profile
BWMS type & approval · Class / RO
Next survey & dry-dock date
Planned major modifications / retrofits

PLANNING CLOCK

NEXT 30–90 DAYS

CHECK
Confirm applicable regulations per vessel
Check class/flag/RO survey requirements
Identify documentation gaps

3–6 MONTHS

PLAN
Technical modification / retrofit decisions
Fuel & energy strategy; verifier arrangements
Crew & shore-side training updates

6–12+ MONTHS

EXECUTE
Integrate modifications into next dry-dock
Budget for allowances/penalties/retrofits
Review charter-party & contractual clauses

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IN FORCE

ADOPTED — FUTURE EFFECTIVE DATE

NOT ADOPTED / SCENARIO

REGIONAL

Sources: IMO · MARPOL/SOLAS/STCW · European Commission · UK ETS Authority (GOV.UK) · flag/class societies. Planning aid only — confirm with your class society, flag administration or legal/compliance advisor. Checked: 18 Aug 2026 · Owner: [Company / Compliance Dept.] · v1.1