

2026 regulatory reference for ships

MARPOL, SOLAS and cargo code requirements

Pollution prevention, ship safety and cargo carriage rules in one reference: the certificates, record books, limits and codes a vessel must carry, record and be ready to show Port State Control.

MARPOL

SOLAS

IMDG

IMSBC

IBC

IGC

Key MARPOL dates, 2024 to 2028

1 May 2024

Garbage Record Book threshold lowered from 400 GT to 100 GT (MEPC.360(79))

1 May 2025

Mediterranean Sea ECA: 0.10% sulphur limit enforced

1 Jan 2026

Enhanced IMO DCS data per consumer type; revised SEEMP Parts II & III on board (5,000 GT+)

1 Mar 2026

Canadian Arctic and Norwegian Sea ECAs enter into force

1 Mar 2027

0.10% sulphur limit applies in Canadian Arctic and Norwegian Sea ECAs

1 Sep 2028

0.10% sulphur limit applies in North-East Atlantic ECA (in force 1 Sep 2027)

The six annexes at a glance

Oil

Prevention of pollution by oil

- Oil Record Book Part I (machinery) and Part II (cargo, tankers)
- IOPP Certificate
- 15 ppm Oily Water Separator; adequate sludge tank capacity
- Ten Special Areas with stricter discharge limits

Noxious liquid substances

NLS carried in bulk

- Cargo Record Book
- NLS Certificate of Fitness
- IBC Code reference
- Four pollution categories: X, Y, Z and OS, each with its own discharge limits

Harmful substances

Carried in packaged form

- IMDG Code reference
- Cargo declaration, marking and labelling
- Stowage and segregation
- Reporting requirements

Sewage

Prevention of pollution by sewage

- International Sewage Pollution Prevention (ISPP) Certificate
- Sewage treatment plant or holding tank
- Discharge distance and concentration limits by location

Garbage

Prevention of pollution by garbage

- Garbage Record Book, now 100 GT and above
- Garbage Management Plan
- Placards displayed
- Eight Special Areas with stricter discharge restrictions

Air pollution

Prevention of air pollution from ships

- IAPP and EIAPP Certificates
- SOx and NOx limits in Emission Control Areas
- EEXI, CII, revised SEEMP Parts II and III
- Enhanced IMO DCS reporting from 1 January 2026

Mandatory record books

Each tied to an annex and subject to PSC inspection

Annex I Oil Record Book Parts I & II Part I machinery space: bunkering, internal transfers, sludge disposal, OWS discharges, bilge handling. Part II tankers: loading, transfer, washing, ballast. Master signs every page.	Annex II Cargo Record Book NLS ships under the IBC Code: loading, unloading, transfer, tank washing and residue handling for Category X, Y, Z and OS cargoes. Master countersigns every operation.	Annex V Garbage Record Book All disposal, incineration and shore reception operations. Applies from 100 GT (previously 400 GT) since 1 May 2024. Garbage categories A to K per Appendix II.	Annex VI ODS Record Book Installation, repair, maintenance and disposal of refrigerants, fire-extinguishing agents and other ozone-depleting substances. All ships with ODS-containing equipment.	Annex VI Fuel oil changeover record Logged on every ECA entry and exit: time, position, fuel type and volumes. SOx compliance verified per ECA entry.
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Retention: Oil Record Book and Cargo Record Book 3 years from last entry. Garbage Record Book 2 years from last entry. Bunker Delivery Notes 3 years. MARPOL fuel samples until the fuel is substantially consumed, and not less than 12 months.

Discharge limits by annex

Key conditions verified by PSC inspectors

Annex / type	Discharge	Limit	Conditions	Record required
I · Machinery space	Oily bilge water	15 ppm max	En route; OWS with 15 ppm alarm and automatic stop	ORB Part I entry
I · Tanker cargo area	Cargo oil residues	30 L per nautical mile	En route, 50 nm+ from land, ODME operating, outside Special Areas; total quantity limit applies	ORB Part II entry
I · Special Areas, cargo area	Oily mixtures	Prohibited	Reception facility only	Receipt + ORB Part II entry
I · Special Areas, machinery	Oily bilge water	15 ppm max	Same OWS conditions; not permitted in the Antarctic area	ORB Part I entry
II · Category X	NLS residues	Prewash to 0.1% by weight	Prewash residues to reception; later washings under Y/Z conditions	Receipt + Cargo Record Book
II · Category Y / Z	NLS residues	Permitted residue quantity	En route 7 kn+, 12 nm+ from land, depth 25 m+, below waterline	Cargo Record Book entry
IV · Approved STP	Treated effluent	No visible solids or discolouration	No distance restriction	ISPP Certificate + STP log
IV · Comminuted	Comminuted + disinfected	Approved system	3 nm+ from land	ISPP Certificate + log
IV · Untreated	From holding tank	Approved moderate rate	12 nm+ from land, en route, 4 kn+	ISPP Certificate + log
V · Food waste	Comminuted food waste	Through 25 mm screen	3 nm+ from land, en route	GRB entry
V · Food (Special Area)	Comminuted food waste	Through 25 mm screen	12 nm+ from land, en route	GRB entry
V · Cargo residues	Not harmful to marine environment	Per cargo classification	12 nm+ from land, en route	GRB entry + classification
V · Plastics	Any form	Prohibited	Anywhere	Reception only + GRB
VI · SOx global	Fuel sulphur content	0.50% m/m max	Outside ECAs	BDN + MARPOL fuel sample
VI · SOx ECA	Fuel sulphur content	0.10% m/m max	Inside ECAs	BDN + fuel changeover record

Annex VI emissions requirements for 2026

From sulphur to greenhouse gas

Regime	Limit	Effective	Scope	Tracking action
SOx · global cap	0.50% m/m sulphur	1 January 2020	Outside ECAs	BDN + MARPOL fuel sample
SOx · ECA	0.10% m/m sulphur	2015, then ECA by ECA	Inside ECAs	Fuel changeover record per ECA

Regime	Limit	Effective	Scope	Tracking action
NOx · Tier I	17.0 g/kWh*	Ships built 2000–2010	Engines over 130 kW	EIAPP Certificate + survey
NOx · Tier II	14.4 g/kWh*	Ships built from 2011	Global	EIAPP Certificate + survey
NOx · Tier III	3.4 g/kWh*	North American & US Caribbean: built from 2016. Baltic & North Sea: from 2021. Canadian Arctic: from 2025	Inside NOx ECAs	EIAPP Certificate (Tier III)
EEXI	Attained EEXI at or below required EEXI	1 January 2023	Specified ship types, 400 GT+. New ships whose attained EEDI already meets EEDI Phase 2 or 3 are deemed to comply	Verified at the first annual, intermediate or renewal IAPP survey; IEE Certificate
CII rating A–E	Annual reduction factor	1 January 2023	Specified ship types, 5,000 GT+	D for 3 years or E: corrective action plan
SEEMP Part II	Fuel data collection plan	2019; revised version by 1 January 2026	Ships 5,000 GT+	Revised Part II + Confirmation of Compliance
SEEMP Part III	CII implementation plan	2023; revised for 2026–2028 by 1 January 2026	Ships 5,000 GT+	Revised Part III on board
IMO DCS - enhanced	Per consumer type	Data from 1 January 2026	Ships 5,000 GT+	Fuel data per main engine, auxiliaries, boilers
EU ETS	Allowances + surrender	Phased 2024–2026	Ships 5,000 GT+ at EU ports	Verified emissions + allowances
FuelEU Maritime	GHG intensity reduction	1 January 2025	Ships 5,000 GT+ at EU ports	Well-to-wake intensity reporting

* NOx limits shown for engines below 130 rpm; limits reduce at higher engine speeds.

ECAs and Special Areas

Five ECAs enforce the 0.10% sulphur limit today; three more are phasing in

Baltic Sea SOx since 2006 NOx Tier III for ships built on or after 1 January 2021.	North Sea SOx since 2007 NOx Tier III for ships built on or after 1 January 2021.	North American Area Since 2012 SOx + NOx Tier III for ships built from 2016. US and Canadian waters out to 200 nm.	US Caribbean Sea Since 2014 SOx + NOx Tier III for ships built from 2016. Puerto Rico and US Virgin Islands.	Mediterranean Sea SOx from 1 May 2025 SOx and particulate matter ECA only. No NOx designation.
Canadian Arctic In force 1 March 2026 0.10% sulphur from 1 March 2027. NOx Tier III for ships keel-laid from 1 January 2025.	Norwegian Sea In force 1 March 2026 0.10% sulphur from 1 March 2027. NOx Tier III for new ships under the contract, keel and delivery date rule.	North-East Atlantic In force 1 Sept 2027 Adopted at MEPC 84. 0.10% sulphur from 1 September 2028. NOx Tier III for new ships from 2027.	Annex I Special Areas Ten areas Mediterranean, Baltic, Black Sea, Red Sea, Gulfs area, Gulf of Aden, Antarctic, North-West European waters, Oman area of the Arabian Sea, Southern South African waters.	Annex V Special Areas Eight areas Mediterranean, Baltic, Black Sea, Red Sea, Gulfs area, North Sea, Antarctic, Wider Caribbean region.

SOLAS chapters and certificates

Safety of Life at Sea: what applies and what must be on board

Chapter II-1 Construction Subdivision, stability, machinery and electrical installations. Lifting appliances and anchor handling winches under regulation II-1/3-13. Cargo Ship Safety Construction Certificate	Chapter II-2 Fire protection Fire prevention, detection and extinction per the FSS Code. Fire control plan, fire-fighting systems, training and drills. Covered by Safety Construction and Equipment certificates	Chapter III Life-saving appliances Survival craft, rescue boats and personal LSA per the LSA Code. Muster list, abandon ship drills, maintenance and servicing. Cargo Ship Safety Equipment Certificate	Chapter IV Radiocommunications GMDSS equipment by sea area, qualified radio operators and radio records. Cargo Ship Safety Radio Certificate	Chapter V Safety of navigation Applies to all ships. AIS, ECDIS, VDR, BNWAS, voyage planning, danger messages and manning. Minimum Safe Manning Document
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Chapter VI Carriage of cargoes and fuels Cargo information, verified gross mass of containers, Grain Code, cargo securing and bulk cargo loading. Cargo Securing Manual; Grain Document of Authorization	Chapter VII Dangerous goods Packaged goods (IMDG), chemicals in bulk (IBC), liquefied gases in bulk (IGC) and nuclear fuel cargo (INF). Document of Compliance for dangerous goods; Certificates of Fitness	Chapter IX ISM Code Safety management system, designated person ashore, internal audits, non-conformities and management review. Document of Compliance + Safety Management Certificate	Chapter XI-1 & XI-2 Maritime safety and security Enhanced survey programme, IMO ship number, Continuous Synopsis Record, ISPS Code ship security plan and SSO. International Ship Security Certificate	Chapters XII & XIV Bulk carriers and polar ships Additional structural and loading safety for bulk carriers. Polar Code for ships operating in polar waters. Polar Ship Certificate where applicable
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SOLAS amendments in force from 1 January 2026

New regulation II-1/3-13 for onboard lifting appliances and anchor handling winches, with existing equipment tested and thoroughly examined by the first renewal survey. Fuel oil flashpoint declaration from the supplier before bunkering (II-2/4). Mandatory reporting of lost freight containers (V/31 and V/32). Passenger ships carry a Passenger Ship Safety Certificate in place of the cargo ship certificates.

Cargo codes compliance

Mandatory and supporting IMO codes by cargo type

Code	Cargo	Required under	Key compliance on board
IMDG Code	Dangerous goods in packaged form	SOLAS VII-A; MARPOL Annex III	Dangerous goods declaration and manifest, segregation and stowage plan, Document of Compliance. Amendment 42-24 mandatory from 1 January 2026
IMSBC Code	Solid bulk cargoes, Groups A, B and C	SOLAS VI and VII	Shipper's cargo declaration; for Group A cargoes that may liquefy, TML and moisture content certificates before loading
IBC Code	Dangerous chemicals in bulk	SOLAS VII-B; MARPOL Annex II	International Certificate of Fitness; ship type and cargo listed per Chapter 17; P&A Manual; Cargo Record Book
IGC Code	Liquefied gases in bulk	SOLAS VII-C	International Certificate of Fitness; products listed per Chapter 19; cargo containment and gas detection
Grain Code	Grain in bulk	SOLAS VI-C	Document of Authorization and grain loading stability information; heeling moment calculations
INF Code	Irradiated nuclear fuel, plutonium, high-level radioactive waste	SOLAS VII-D	International Certificate of Fitness for the Carriage of INF Cargo
Container VGM	Packed containers	SOLAS VI/2	Verified gross mass obtained from the shipper before a container is loaded
CSS Code	Non-bulk cargo stowage and securing	Guidance; Cargo Securing Manual required by SOLAS VI/5 and VII/5	Approved Cargo Securing Manual; lashing equipment maintained and records kept
BLU Code	Loading and unloading of bulk carriers	Guidance referenced by SOLAS VI/7	Agreed ship/shore loading and unloading plan; stress and stability monitored throughout
TDC Code	Timber deck cargoes	Guidance (2011 TDC Code)	Stowage, securing and stability for timber on deck; timber load line where assigned

Beyond MARPOL and SOLAS

Other regimes that PSC, class and port authorities check

Hong Kong Convention In force 26 June 2025 - Ships 500 GT and above on international voyages - Inventory of Hazardous Materials Part I developed, verified and maintained for the life of the ship - International Certificate on Inventory of Hazardous Materials, or Statement of Compliance for non-party flags - Existing ships: certificate by the first renewal survey after entry	US Vessel General Permit 2013 VGP still in force - Commercial vessels 79 ft and above discharging in US waters within 3 nm - Notice of Intent for permit coverage; Annual Report submitted by 28 February - Analytical monitoring and sampling where the permit requires it, including ballast water treatment effluent and bilgewater - Routine visual inspections, annual vessel inspection and	VIDA transition USCG rules pending - EPA finalised national discharge standards under VIDA in 2024 - They become enforceable only when the US Coast Guard publishes its implementing regulations - Until then the 2013 VGP, USCG ballast water rules and state requirements continue to apply - No new VGP is being issued; keep current VGP compliance running while preparing for the change	Ballast water and antifouling BWM and AFS Conventions - BWM Convention: approved treatment system meeting the D-2 standard, International Ballast Water Management Certificate - Ballast Water Management Plan and Ballast Water Record Book maintained - US ballast water rules apply in addition in US waters - AFS Convention: International Anti-fouling System Certificate;
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into force, and in all cases by 26 June 2030 or before recycling	drydock reporting	no organotin and no cybutryne in the coating
- Before recycling: IHM Parts I, II and III, approved Ship Recycling Plan and International Ready for Recycling Certificate - Recycling only at an authorised facility holding a Document of Authorization	- Environmentally acceptable lubricants at all oil-to-sea interfaces, or a documented technical infeasibility - Records kept on board and made available on request	

What PSC inspectors verify

Recurring detention causes across global MOUs

Annex I · Oil ✓ ORB entries current and consistent with operations ✓ IOPP Certificate valid ✓ 15 ppm alarm and automatic stop tested ✓ Sludge tank capacity vs voyage length ✓ Reception receipts matched to ORB entries ✓ No unexplained gaps in machinery space log	Annex IV · Sewage ✓ ISPP Certificate valid ✓ STP operating per approval certificate ✓ Discharge log vs distance from land and speed minimums ✓ Holding tank capacity vs voyage profile ✓ Comminution and disinfection records for untreated discharge	Annex V · Garbage ✓ Garbage Record Book current (100 GT+) ✓ Garbage Management Plan approved ✓ Placards displayed ✓ Categorisation per Appendix II ✓ Reception facility receipts retained ✓ No plastics discharged in any zone ✓ Special Area distance compliance	Annex VI · Air ✓ IAPP and EIAPP Certificates valid ✓ BDNs retained 3 years; MARPOL fuel samples at least 12 months ✓ Fuel changeover record per ECA entry ✓ ODS Record Book ✓ Revised SEEMP Parts II and III on board ✓ CII rating documentation ✓ IMO DCS reporting current, enhanced data from 1 January 2026
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Hold valid MARPOL, SOLAS, ISM, ISPS, ship recycling and cargo code certificates as applicable, and keep every record book consistent with actual operations.

Summary for awareness only. Always refer to the current consolidated MARPOL and SOLAS texts, the applicable IMO codes and resolutions, US EPA and USCG requirements where relevant, and flag State requirements for your vessel.



AUK Marine and Mining