

Agenda Item 2 – Compliance with NOx Tier III standards

Part 3 – Interactive session

Malta, 7-8 October 2026

Regional Expert Meeting on the Possible Designation of the Mediterranean, as a whole, as a NOx ECA



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Agenda item 2

Interactive session to conclude on “Compliance with NOx Tier III standards”

- **Discussion**

- let's talk and share national expertise, concerns, expected barriers, lessons learned...
- Through guiding questions, on a form distributed to each participant

- **Case studies**

- Recap on sources and basis for a national Tier III compliance regime
- Examples of structure and communication system established by Flag State Administrations, for their fleet



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REMPEC Consultant
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Discussion through Q&A

Discussion

Let's take some time to reflect on various aspects, share national perspectives and good practices.

Each participant receives a form, which **contains a series of questions, grouped by topics.**

Questions are only intended to **guide and help our conversation and trigger a debate in relation to MARPOL Annex VI and NO_x ECA.**

There are no good, bad, or mandatory answers.

Discussion is initiated on Day 1 and could continue on Day 2 of this Meeting.

Discussion

1 – Regulatory framework required to implement Regulation 13 and Tier III limit, and to control compliance

As an intro, Tell us about **the fleet under your Flag**? Which key sectors? (Ferries or ships on domestic routes; large commercial fleet on international voyages; service and support vessels, fishing vessels, yachts and leisure...)

- Can you explain broadly the **structure of your maritime administration**? Which department controls what?
- Are responsibilities (Flag/Port) shared within the same departments?
- Is an adequate regulatory framework already **used to implement regulation 13**? And to **control compliance**, for your fleet and within your ports?
- Who is in charge of inspections during PSC?

Discussion

1 – Regulatory framework required to implement Regulation 13 and Tier III limit, and to control compliance

- Do you have **national surveyors** as part of your Administration employees, or do you rely mostly on contractual surveyors?
- How do you **manage your RO's** ?
- Have you signed **Agreements**, with differences from one RO to another?
- Any other specific programs in place for monitoring or communication with RO's?
- Is there a mechanism to collect and manage **data related to ship NO_x** emissions? Which data would be interesting to collect, to your opinion?

Discussion

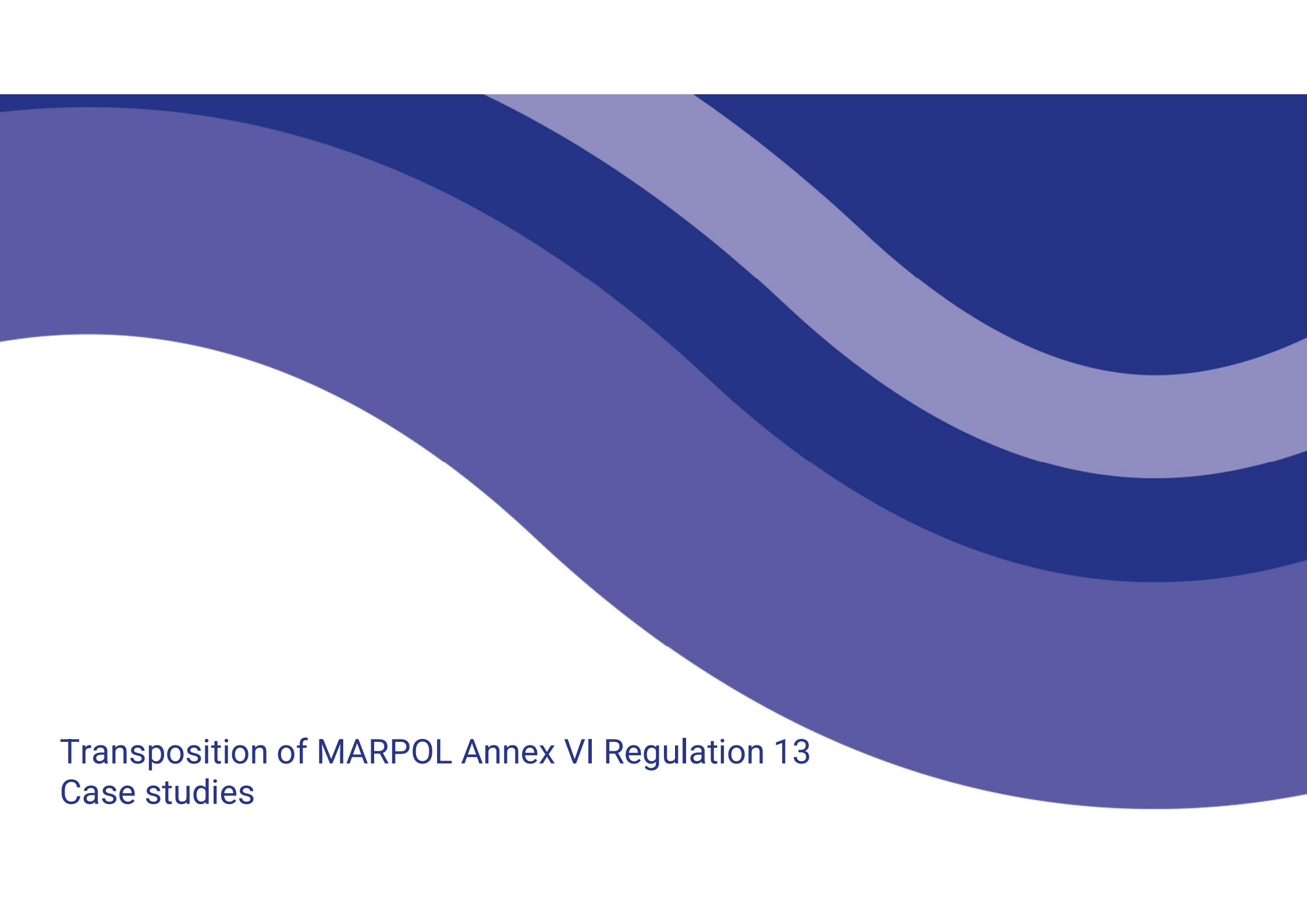
2 – Communication channels and awareness raising

- Which tools are available to **raise awareness** and provide **trainings** within your Administration, for example for your PSCO, or employees in charge of certificate issuance or surveys?
- Are you aware of **online training courses**? Have you ever used any?
- Do you have access to **support and assistance** in terms of training, or legal drafting or technical matters? Through which mechanisms?

Discussion

3 – Experience feedback, lessons learned

- During, and following, the implementation of the Med SECA, could you cite 2 or 3 **obstacles** faced at national or international levels?
- Could you explain why the situation or the context **is different** for the implementation of a NECA?
- Could you give examples of **possible obstacles and challenges** for the implementation, and the enforcement, of **NECA Tier III limit**, at a national level or international level?



Transposition of MARPOL Annex VI Regulation 13

Case studies

Regulation 13 in practice – Your turn!

Step 0 – TRANSPOSITION

Process based on your national legal system

Instruments to enact MARPOL Annex VI should already be in place, if your State is Party to Annex VI

Step 1 – IMPLEMENTATION

Purpose?

- To bring Regulation 13 into effect, as a Flag State and a Port State

List your obligations under Reg. 13 – Where can I get the information?

- In the IMO Non-exhaustive List of obligations, A 34/Res.1208
- In the Guide: Clause-by-clause analysis of MARPOL Annex VI, 2020

And then what?

- Based on your national system
- Establish decree, regulations, measures, tools, whatever, to fulfil those obligations

Regulation 13 in practice – Your turn!

Step 2 - COMPLIANCE -> for your fleet

Objective?

Provide instructions to your fleet - and to your employees

- In a form adequate for the structure of your maritime administration
 - Bulletins, marine technical guidance, procedures, technical alerts, etc.

Survey regime and certificates must be in place within your Administration – based on which document(s)?

- The HSSC Guidelines for surveys
- Personnel in charge of surveys and certificates aware and trained

In practice, transposition of Regulation 13

IMO List of obligations A 34/Res.1208	Clause by Clause analysis (GV2050)	Which instructions for your fleet?										
<table><tr><td>Regs. 12.6, 13.5.3 and 14.6</td><td>Approval of an electronic record book concerning the required entries for discharge, transfers and other operations as required under Annex VI</td></tr><tr><td>Regs. 13.1.1.2 and 13.1.2.2</td><td>Nitrogen oxides – acceptance of identical replacement and alternative control measures</td></tr><tr><td>Reg. 13.2.2</td><td>Acceptance of installation of Tier-II engine in lieu of Tier-III engine where Tier-III engine cannot be accommodated, and notifying the Organization</td></tr><tr><td>Reg. 13.5.2.2</td><td>Combined nameplate diesel engine – application as referred to in the paragraph</td></tr><tr><td>Reg. 13.7.2</td><td>Approved method not commercially available</td></tr></table>	Regs. 12.6, 13.5.3 and 14.6	Approval of an electronic record book concerning the required entries for discharge, transfers and other operations as required under Annex VI	Regs. 13.1.1.2 and 13.1.2.2	Nitrogen oxides – acceptance of identical replacement and alternative control measures	Reg. 13.2.2	Acceptance of installation of Tier-II engine in lieu of Tier-III engine where Tier-III engine cannot be accommodated, and notifying the Organization	Reg. 13.5.2.2	Combined nameplate diesel engine – application as referred to in the paragraph	Reg. 13.7.2	Approved method not commercially available	• This provision should be incorporated in the relevant national legislation. The regulation also provides that, under certain circumstances, relaxation from the NOx certification requirements for certain specified domestic ships may be accepted. These instances should be addressed within the relevant national legislation. • The relevant national legislation should make mandatory the application of the NTC 2008 to survey and certification of applicable marine diesel engines. The NTC needs to be made mandatory in the relevant national legislation. Several countries incorporate it by reference and publish it in associated guidance referenced in the legislation.	RO, ship owners and ship operators, engine manufacturers Must be aware of the following: • Content of all surveys, in relation to EIAPP and IAPP To support stakeholders in preparing for compliance and upcoming changes: • Develop a “regulatory watch” system for awareness raising Explain actions required for new ships and existing ships
Regs. 12.6, 13.5.3 and 14.6	Approval of an electronic record book concerning the required entries for discharge, transfers and other operations as required under Annex VI											
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Reg. 13.7.2	Approved method not commercially available											
TRANSPPOSITION Each item shall be transposed in the appropriate domestic instrument		IMPLEMENTATION Content of surveys based on HSSC										

Case study – A Flag State technical notice to explain Annex VI

<https://www.bahamasmaritime.com/wp-content/uploads/2026/05/MN061-MARPOL-Annex-VI.pdf>

Type “BMA MARINE NOTICE 61” in your search engine
Click Download.

Let’s read together.

Marine Notice 61

“This Notice outlines the Bahamas Maritime Authority (BMA) position on the **requirements of Annex VI** of the International Convention for the Prevention of Pollution from Ships (MARPOL Annex VI)”

-> **page 7 for Regulation 13**

ANY COMMENTS?

What should be noted? What strikes you?

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MN061 – MARPOL Annex VI

Marine Notices

24 September 2024



[Download \[PDF 388 KB\]](#)



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Case study – A Flag State communication to industry

From the Danish Maritime Authority

<https://www.dma.dk/environment-and-climate/nitrogen-oxide-nox>

Type: DMA ship NOx – in your search engine

ANY COMMENTS?

Best practice?

How to do

For Danish ships sailing to ports outside Denmark, the tier III requirements must be documented by the ships EIAPP certificate, IAPP certificate, the technical file as required in MARPOL Annex VI and the NOx Technical Code Chapter 2 part 2.2.5.

For Danish ships exclusively sailing to and from Danish ports the tier III requirements can be documented by the engines type approval certificate (International IMO certificates is not necessary).

Frequently asked questions

What if the ship is trading in both tier II and tier III areas?

Is it possible to install a cheaper tier II approved engine and then build in a selective catalytic reduction system (SCR system) in order to fulfill the requirement?

What if a new engine is installed in an existing ship immediately before 1 January 2021?

What if a ship owner have an old ship with tier I or tier II engines and would like to meet the higher tier III requirements for environmental reasons can an after treatment system then be installed?



Environment & climate

Greenhouse gas emissions

Sulphur (Sox)

Ballast water

Zero-Emission Shipping Mission

• Nitrogen oxide (NOx)

Biofuel

Nitrogen oxide (NOx)

The purpose of NOx regulations is to reduce the emission of nitrogen oxide (NOx) from ships since it contributes to air pollution ashore and to algal bloom in the sea.

NOx reguleringen indeholder tre niveauer, Tier I, Tier II og Tier III.

The NOx regulations includes three levels Tier I, Tier II and Tier III.

Tier I entered into force on the 1 January 2000;

Tier II entered into force on the 1 January 2011;

Tier III entered into force on the 1 January 2016 in the North American and the United States Caribbean ECA areas; and **enters into force on the 1 January 2021 in the ECA areas covering the North Sea and the Baltic Sea**. These ECA areas includes the Baltic Sea, the Danish waters, Kattegat, Skagerrak, the Channel and the North Sea south of 62° north latitude and east of 4° west longitude.



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Other aspects related to implementation

Let's recall the recommendations for Policymakers, from Plan Bleu

In Plan Bleu *Technical Report - Towards a Mediterranean NECA: Contextual Foundations and Sectoral Implications for Fisheries and Tourism - Paper 1. Expert Survey on NOx Controls in Mediterranean Marine Settings* – REMPEC/WG.62/INF.5

In practice, internalisation requires policy tools that both incentivise investment in cleaner technologies and prevent free-riding, while also addressing the uneven distribution of costs across sectors. This makes the choice of policy instrument, be it tax incentives, subsidies, emissions trading, or performance standards, central to the feasibility of implementation. However, the adoption of any policy tool operates within the constraints of political economy. Sectoral lobbying power, conflicting priorities between economic competitiveness and environmental protection, and the degree of coordination among maritime, fisheries, tourism, and environmental policy bodies all influence the likelihood of effective policy action.

Survey responses on the perceived difficulty of implementing NOx control policies reveal that a substantial majority of experts view the process as highly challenging. Combining the “Very Challenging” (27%) and “Challenging” (37%) categories, nearly two-thirds of respondents anticipate significant barriers to implementation. An additional 30% rated

Other aspects related to implementation

Recommendation for Policymakers, from Plan Bleu – Technical Report - Towards a Mediterranean NECA: Contextual Foundations and Sectoral Implications for Fisheries and Tourism

Paper 2. Potential Impacts of the implementation of the NOx Emission Control Area on Tourism in the Mediterranean region - REMPEC/WG.62/INF.5

To ensure the **successful implementation** of the Med NOx ECA, policymakers could adopt a **multifaceted approach** that balances environmental, economic, and social objectives. Based on:

- Providing Financial incentives
- Investing in Research and development
- Supporting Capacity building
- Building Public awareness
- Integrating climate and tourism policies
- Improving Monitoring systems

2.6.3 Recommendations for Policymakers

To ensure the successful implementation of the Med NOx ECA, policymakers could adopt a multifaceted approach that balances environmental, economic, and social objectives. Insights gathered from the survey conducted for this paper emphasize the importance of strengthening regional collaboration, as the transboundary nature of maritime emissions requires harmonized regulatory frameworks and shared enforcement mechanisms across Mediterranean countries. Coordinated efforts facilitated by regional bodies such as UNEP/MAP and its Regional Activity Centres (RACs) can help streamline compliance processes, ensuring consistent application of emission standards across the region.

2.6.3.1 Providing Financial incentives

Providing financial support for stakeholders is another essential component. The costs associated with transitioning to cleaner technologies can be prohibitive, particularly for smaller operators and businesses. Many survey respondents highlighted the need for financial aid programs such as subsidies, grants, and low-interest loans to alleviate the financial burden on these stakeholders and accelerate the adoption of necessary technologies.

2.6.3.2 Investing in Research and development

Encouraging research and development (R&D) was also identified as a key strategy for achieving cost-effective compliance and innovation. Respondents recommended implementing incentives for R&D initiatives focused on alternative fuels, emission-reducing technologies, and green infrastructure. Collaborative partnerships with research institutions and private companies should be prioritized to ensure that these technologies are tested, refined, and implemented efficiently across the region.

2.6.3.3 Supporting Capacity building

In addition, capacity building emerged as a critical aspect of the transition. Many survey participants stressed the importance of investing in training programs to equip workers with the skills needed for emerging green industries. This is particularly crucial for small businesses and local communities, where knowledge gaps may hinder the adoption of sustainable practices.

2.6.3.4 Building Public awareness

Public awareness campaigns are also vital to garner support for the Med NOx ECA. Survey responses emphasized the importance of highlighting the benefits of emission reductions, such as improved air quality and healthier ecosystems, while educating the public about the available support mechanisms and compliance requirements. Equity in policy implementation must remain a central consideration. The survey revealed that ensuring the economic benefits of the Med NOx ECA are distributed fairly is key, with special attention given to vulnerable groups such as small businesses and underserved communities. This can be achieved by prioritizing funding for regions in need of additional support and involving diverse stakeholders in decision-making processes.

2.6.3.5 Integrating climate and tourism policies

Integrating climate and tourism policies was another critical recommendation from survey participants. Policymakers must align emission reduction objectives with broader tourism strategies to enhance the region's reputation as a sustainable destination. Initiatives promoting eco-tourism, cultural preservation, and sustainable transportation can complement the Med NOx ECA, creating synergies between economic development and environmental protection.

2.6.3.6 Improving Monitoring systems

Lastly, robust monitoring systems must be put in place to track the progress of the Med NOx ECA. Transparent data collection and reporting, as suggested by the survey, will allow policymakers to evaluate the initiative's impact and refine strategies as needed, ensuring that it delivers its intended environmental and economic benefits over the long term.



Conclusion

**Any question or
clarification,
please ask!**

End of

**Compliance with NOx Tier III
standards
Part 3 – Interactive session**

And now

**Other aspects related to Reg. 13
and Tier III**



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