
**MEDITERRANEAN ACTION PLAN (MAP)
REGIONAL MARINE POLLUTION EMERGENCY RESPONSE CENTRE
FOR THE MEDITERRANEAN SEA (REMPEC)**

Regional Expert Meeting on the possible designation of the
Mediterranean Sea, as a whole, as an Emission Control Area for
Nitrogen Oxides (Med NO_x ECA) pursuant to MARPOL Annex
VI

REMPEC/WG.62/8
Date: 15 December 2025

Malta, 18-19 November 2025

Original: English

REPORT

**REGIONAL EXPERT MEETING ON THE POSSIBLE DESIGNATION OF THE
MEDITERRANEAN SEA, AS A WHOLE, AS AN EMISSION CONTROL AREA FOR
NITROGEN OXIDES (MED NO_x ECA) PURSUANT TO MARPOL ANNEX VI**

Lija, Malta, 18 to 19 November 2025

This activity was financed by the International Maritime Organization (IMO)'s Integrated Technical Cooperation Programme (ITCP) and the Mediterranean Trust Fund (MTF), and was implemented by the Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea (REMPEC), in cooperation with the IMO.

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SUMMARY SHEET

Title of the Workshop:	Regional Expert Meeting on the possible designation of the Mediterranean Sea, as a whole, as an Emission Control Area for Nitrogen Oxides (Med NO _x ECA) pursuant to MARPOL Annex VI
Host:	Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea (REMPEC)
Venue and date:	Malta Transport Centre, Lija, Malta 18-19 November 2025
Type:	Regional
Organised by:	REMPEC, in close cooperation with the International Maritime Organization (IMO)
Supported by:	IMO's Integrated Technical Cooperation Programme (ITCP) and the Mediterranean Trust Fund (MTF)
Number of Participants and Number of Countries and/or Organisations:	33 participants from 20 out of 22 Contracting Parties to the Barcelona Convention, as well as representatives from relevant regional and international organisations

Summary

This document presents the Report of the Regional Expert Meeting on the possible designation of the Mediterranean Sea, as a whole, as an Emission Control Area for Nitrogen Oxides (Med NO_x ECA) pursuant to MARPOL Annex VI, which was held in Lija, Malta, from 18 to 19 November 2025.

The principal objectives of the Meeting were to provide for a greater understanding of the requirements for implementation and enforcement of the Med NO_x ECA; and to discuss the Final draft Technical and Feasibility Study to examine the possibility of designating the Med NO_x ECA, including the draft final recommendations and associated roadmap.

The discussions of the Meeting are summarised in the present Report and the Conclusions and Recommendations adopted by the Meeting are set out in annex VI of the Report.

The Report of the Meeting will be transmitted, by the REMPEC Secretariat, to the Seventeenth Meeting of the Focal Points of REMPEC for consideration and further guidance.

Key words: Air pollution from ships, Mediterranean Sea, Emission Control Area, Med NO_x ECA, MARPOL Annex VI, designation, ratification, implementation, enforcement

WBS element: TC/2505-01-2000

Coordinator: Ivan Sammut (REMPEC)

INTRODUCTION

1.1 The Regional Expert Meeting on the possible designation of the Mediterranean Sea, as a whole, as an Emission Control Area for Nitrogen Oxides (Med NO_x ECA) pursuant to Annex VI to the International Convention for the Prevention of Pollution from Ships (MARPOL), hereinafter referred to as the Meeting, was convened in Lija, Malta, from 18 to 19 November 2025. The Meeting, which was organised by the Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea (REMPEC), in close cooperation with the International Maritime Organisation (IMO), pursuant to the Programme of Work and Budget 2024-2025 of the Mediterranean Action Plan (MAP) of the United Nations Environment Programme (UNEP), also referred to as UNEP/MAP, adopted by the 23rd Ordinary Meeting of the Contracting Parties to the Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean (the “Barcelona Convention”) and its Protocols (COP23) (Portoroz, Slovenia, December 2023), was financed by the IMO’s Integrated Technical Cooperation Programme (ITCP) and the Mediterranean Trust Fund (MTF).

1.2 The principal objectives of the Meeting, as stated in Document REMPEC/WG.62/1/1, were:

- .1 to raise awareness on MARPOL Annex VI, as well as to provide for a greater understanding and appreciation of the requirements for implementation and enforcement of the Med NO_x ECA, in order to be able to lead Governments’ efforts towards ratification and more effective implementation, compliance and enforcement, both as a flag State and as a port State, including the sharing of experience and lessons learned from the designation of other similar ECAs, over the first day of the Meeting; and
- .2 to discuss the Final draft Technical and Feasibility Study, together with the draft final recommendations, including the draft final roadmap, prepared by REMPEC, a copy of which was circulated to the NECA Technical Committee of Experts (TCE) in August 2025, over the last day of the Meeting, with a view to finalisation and onward transmission to the Seventeenth Meeting of the Focal Points of REMPEC (to be tentatively held in May 2027).

VENUE, DATES, ROLES AND PARTICIPANTS

1.3 The venue for the Meeting was:

Malta Transport Centre
Triq Pantar, Hal Lija, LJA 2021 Malta

1.4 The Meeting was held on 18 and 19 November 2025 at the above venue that included all amenities needed for the Workshop, kindly provided by the host country, Malta.

1.5 The choice of venue proved to be conducive to the Meeting success as it had all the facilities required for the purpose. The venue was equipped with microphones for each individual and interpretation facilities.

1.6 REMPEC conducted all the logistics for the Meeting, including the opening and closing ceremonies, arrangements of facilities for use by the participants, REMPEC consultants and speakers, reproduction of materials, operation of sound/video equipment and simultaneous English and French interpretation.

1.7 The target audience for the Meeting were Government officials responsible for ratification, implementation and enforcement of MARPOL Annex VI. All REMPEC Prevention Focal Points were invited to nominate jointly and, in consultation with the REMPEC Governmental Focal

Points and the representative(s) serving on the MAP NO_x Technical Committee of Experts (NECA TCE), their representatives at the Meeting. The participants represented authorities/organisations responsible for the regulation of shipping as well as authorities/organisations in charge of issues related to the marine environment.

1.8 Mr Ivan Sammut, Head of Office, REMPEC, oversaw the organisation and coordination of the Meeting.

1.9 The Meeting was attended by delegations from the following Contracting Parties to the Barcelona Convention:

ALBANIA	ITALY
ALGERIA	LEBANON
BOSNIA AND HERZEGOVINA	LIBYA
CROATIA	MALTA
CYPRUS	MONTENEGRO
EGYPT	MOROCCO
EUROPEAN UNION	SLOVENIA
FRANCE	SPAIN
GREECE	TUNISIA
ISRAEL	TÜRKİYE

by a representative from the following organisations of the United Nations:

- INTERNATIONAL MARITIME ORGANIZATION (IMO)

by a representative from the following Regional Activity Centre of UNEP/MAP:

- PLAN BLEU REGIONAL ACTIVITY CENTRE (PB/RAC)

1.10 A complete list of participants is available in **Annex I** to this report.

OPENING OF THE MEETING

1.11 The Meeting was opened by the Head of Office of REMPEC, Mr Ivan Sammut, on Tuesday, 17 November 2025 at 0900 hours. He welcomed the participants to the Meeting and explained the objectives of the Meeting. He also welcomed the IMO representative Mr Yusuke Kawai, Mr Aleix Pons and Mr Andrew King (RICARDO Consulting, S.L.) and Ms Marie Caillierie (REMPEC Consultant). He emphasised the Mediterranean's status as one of the world's busiest maritime regions and underscored the environmental and public-health challenges posed by air pollution from shipping.

1.12 Mr Sammut highlighted that building on the successful establishment of the Mediterranean Sulphur Oxides Emission Control Area (Med SO_x ECA), the Meeting aimed to examine scientific evidence, and assess the technical and economic implications of a potential NO_x ECA. He also highlighted the importance of coordinated regional cooperation and the need to integrate the perspectives of all Mediterranean coastal States in shaping a unified position for submission to the IMO's Marine Environment Protection Committee (MEPC).

1.13 He expressed appreciation to Contracting Parties, the financial support provided by the IMO's ITCP, the MTF, and the voluntary contribution from the French Ministry for Europe and Foreign Affairs, the NECA TCE representatives, and the consultants team from Ricardo for their contributions, particularly to prepare the draft Detailed Technical and Feasibility Study that formed the basis of the Meeting's discussions. Participants were encouraged to engage actively in refining the draft Study's

recommendations and roadmap, with outcomes to be submitted to the 17th Meeting of REMPEC Focal Points, to be tentatively held in May 2027.

1.14 Mr Sammut concluded by calling for constructive dialogue and reaffirming the region's commitment to advancing sustainable shipping and protecting the marine environment.

ORGANISATION OF THE MEETING

Rules of Procedure

1.15 The Meeting agreed to apply, *mutatis mutandis*, the Rules of procedure for Meetings and Conferences of the Contracting Parties to the Convention for the Protection of the Mediterranean Sea against Pollution and its related Protocols (UNEP/IG.43/6, Annex XI) to its deliberations.

Election of Officers

1.16 The Meeting unanimously agreed to elect the following officers of the Meeting:

Prof. Dr. Enis Omerović (Bosnia and Herzegovina)	Chairperson
Ms Ivana Marovic Gusic (Croatia)	Vice-Chairperson
Mr Hatem Feki (Tunisia)	Rapporteur

Working Languages

1.17 The Meeting noted that the working languages of the Meeting were English and French. Simultaneous interpretation services in both languages were provided during the Meeting. All working documents were made available in both official languages of the Centre, i.e. in English and in French. Information documents were made available in their original language, unless a translation was provided in the second working language.

AGENDA ITEM 1: ADOPTION OF THE AGENDA

1.18 The Chairperson thanked the Meeting for supporting his election. He recalled that the Meeting provided an important opportunity to advance the collective understanding of the requirements and implications of implementing MARPOL Annex VI in the Mediterranean region and further the work on the possible designation of the Med NO_x ECA.

1.19 The Chairperson proposed that the Provisional Agenda, as set out in document REMPEC/WG.62/1 and annotated in document REMPEC/WG.62/1/1, be adopted.

1.20 The Meeting adopted the Agenda reproduced in **Annex II** to this report. The list of documents is set out in **Annex III** thereto.

AGENDA ITEM 2: THE INTERNATIONAL REGULATORY FRAMEWORK FOR PREVENTING POLLUTION FROM SHIPS

2.1 Under this item, the IMO representative, Mr Yusuke Kawai, provided an overview of the international framework for preventing pollution from ships. The presentation recalled the structure and decision-making process of the IMO, outlined the roles and responsibilities of national administrations, and reviewed the Annexes to the MARPOL Convention. The objectives of the IMO's Integrated Technical Cooperation Programme (ITCP) and its important contribution to strengthening national and regional capacities for the effective implementation of international maritime instruments were also explained.

2.2 The Meeting took note of the information provided and the comments made on the data presented on concentrations of particulate matters (PM) as a contribution by international shipping and on the indicative timeline of the MARPOL amendment process, from proposal to entry into force.

2.3 Having noted the information provided, the Meeting:

- .1 expressed appreciation for the financial support provided by the IMO's ITCP, the Mediterranean Trust Fund, and the voluntary contribution from the French Ministry for Europe and Foreign Affairs;
- .2 welcomed the work and contributions of all the representatives of the Contracting Parties that participated in the work of the MAP NO_x ECA Technical Committee of Experts (NECA TCE), under the coordination of the Secretariat;
- .3 took note of the information provided on the structure and decision-making process of the IMO, as well as the roles and responsibilities of national Administrations in the effective implementation and enforcement of international maritime instruments;
- .4 acknowledged the importance of the MARPOL Convention and its Annexes, as the cornerstone of the international regulatory framework to prevent pollution from ships, and encouraged Contracting Parties to ensure their effective implementation and enforcement at national level;
- .5 highlighted that international shipping must be regulated at the global level for any control regime to be effective (e.g. to prevent pollution from ships) and to maintain a level playing field for all ships;
- .6 noted with appreciation the objectives of the IMO's ITCP and recognised its significant contribution to strengthening national and regional capacities for the implementation of IMO instruments;
- .7 invited Contracting Parties to continue engaging actively with the IMO under the ITCP and other capacity-building initiatives, and to identify specific areas where technical assistance could further support national efforts; and
- .8 encouraged continued cooperation between REMPEC, the IMO, and Contracting Parties in promoting the effective implementation of international conventions aimed at preventing pollution from ships, in line with regional and global objectives.

AGENDA ITEM 3: OVERVIEW OF MARPOL ANNEX VI & NO_x TECHNICAL CODE

3.1 Under this agenda item, the REMPEC consultant, Ms. Marie Callerie, provided an overview of MARPOL Annex VI, explaining the rationale for regulating air pollution from ships and presenting the current global status of its application. The presentation reviewed key provisions related to notification, surveys and certification, and highlighted the overall framework supporting the reduction of air emissions from international shipping.

3.2 Participants were encouraged to comment or ask questions on this presentation. Clarifications were sought on the link between shipping growth as an international trade and the growth of air emissions.

3.3 The Meeting took note of the information provided and the comments made.

3.4 A second presentation was delivered by Ms Callerie, focusing on the NO_x Technical Code, which complements MARPOL Annex VI by setting out detailed procedures for the certification and verification of marine diesel engines and compliance with NO_x emission limits. The presentation recalled fundamental principles of marine diesel engines and the key technical requirements related to engine testing, survey, certification and equivalents. Other key regulations in MARPOL Annex VI, such as regulation 12 on sulphur oxides (SO_x) limits or regulation 18 on fuel oil quality were also reviewed.

3.5 Clarifications were sought on some aspects, such as the emission abatement technologies; regulation 17 on port reception facilities; or application of regulation 13 to recreational boats.

3.6 The Meeting took note of the information provided and the comments made.

3.7 Having noted the information provided, the Meeting:

- .1 acknowledged the importance of MARPOL Annex VI as a key instrument in addressing air emissions from ships, including the control of SO_x and NO_x, and recognised its relevance to improving air quality and protecting human health and the environment;
- .2 welcomed the detailed explanation of the provisions under MARPOL Annex VI, particularly those related to equivalents, notifications, surveys, and certification, as well as the key technical requirements of the NO_x Technical Code, concerning marine diesel engines and compliance with emission standards;
- .3 encouraged Contracting Parties to continue their efforts to ratify, implement, and enforce MARPOL Annex VI in order to reduce air pollution from ships and contribute to global and regional environmental objectives; and
- .4 invited the Secretariat to continue, subject to availability of funds, supporting Contracting Parties, which so request, through technical assistance, training, and capacity-building activities aimed at enhancing compliance with MARPOL Annex VI and other relevant IMO instruments.

AGENDA ITEM 4: ENFORCEMENT OF MARPOL ANNEX VI- OVERVIEW

4.1 This agenda item addressed enforcement of MARPOL Annex VI. The REMPEC consultant Ms. Caillerie, presented the legal basis for enforcement, as set out in Articles 5, 6, and 7 of the MARPOL Convention, and explained the respective obligations of flag and port States. The importance of the IMO online database (IMO DOCS) was reinstated. The presentation referred to relevant IMO guidance or manuals, available to support administrations in their tasks for transposition and enforcement of MARPOL Annex VI.

4.2 Noting the information provided, the Meeting:

- .1 recognised the critical roles and responsibilities of national administrations in enforcing MARPOL Annex VI, including those of flag States and port States, and encouraged

Contracting Parties to continue strengthening their national frameworks and institutional capacities in this regard;

- .2 invited Contracting Parties to make use of the IMO guidelines and reference materials related to the enforcement of MARPOL Annex VI, and to share experiences and best practices to promote consistent implementation across the region; and
- .3 encouraged the Secretariat to continue supporting Contracting Parties in enhancing their understanding and application of the enforcement provisions of MARPOL Annex VI, through training activities, technical cooperation, and the dissemination of relevant information and materials.

AGENDA ITEM 5: CHALLENGES AND OPPORTUNITIES FOR MEDITERRANEAN COASTAL STATES TO RATIFY AND IMPLEMENT MARPOL ANNEX VI

5.1 Under Agenda item 5, participants were given the opportunity to exchange views, to facilitate the identification of both the challenges to be addressed and the opportunities for enhanced cooperation on the possible designation of a MED NO_x ECA, referring to the current status regarding the ratification of MARPOL Annex VI in the Mediterranean region.

5.2 The Head of Office of REMPEC provided guidance for this roundtable session, in the form of the following questions:

- .1 What is the current status regarding MARPOL Annex VI in their country: ratification, implementation, and enforcement?
- .2 What are the challenges being encountered with MARPOL Annex VI?
- .3 What are the challenges foreseen with the possible designation of a Med NO_x ECA?
- .4 What are the underlying needs and gaps facing Contracting Parties to the Barcelona Convention?
- .5 What are the opportunities arising from MARPOL Annex VI and the Med NO_x ECA?

5.3 Delegations of Algeria, Bosnia Herzegovina, Egypt and Lebanon provided updates on the current status of ratification of MARPOL Annex VI in their respective country and shared the challenges encountered in the process for ratification, implementation, and enforcement.

5.4 During the roundtable session, delegations shared their experiences of political, legal and technical issues encountered in their respective country in relation to ratification and implementation procedures for MARPOL Annex VI, noting the financial burden that implementation may impose to States. In the ensuing discussions, comments were made, inter alia, on the following aspects:

- .1 the implementation of a MED NO_x ECA could be seen as more complex than the implementation of a MED SO_x ECA;

- .2 while supporting the establishment of a MED NO_x ECA, and noting the financial assessments provided in the draft Technical and Feasibility Study, some concerns remained to be addressed, including on the implementation timeframe;
- .3 the need to maintain the competitiveness of national ports;
- .4 the possible burden on flag State and port State inspectors;
- .5 the reinstated need for technical assistance and capacity building for those matters at hand, while acknowledging the initiatives already taken;
- .6 the importance of a comprehensive and regionally balanced cost-benefits assessment and the need for a gradual and equitable transition;
- .7 the financial mechanisms known as “soft loans”; and
- .8 that while concerns were duly noted, it should be acknowledged that investing on public health was an efficient mean to reduce the costs of air pollution to society

5.5 The delegation of Tunisia reaffirmed its long-standing commitment to MARPOL and Annex VI and expressed support for cleaner, more sustainable maritime transport. The delegation underscored the challenges posed by implementing the Mediterranean SO_x ECA, particularly the economic impacts on its fleet, the need for adequate port reception facilities, and fuel availability. These concerns remain priorities for Tunisia as it continues contributing to global Sustainable Development Goals. The statement by the delegation of Tunisia is set out in **Annex VI** to this report.

5.6 The Meeting noted with interest the views shared during the roundtable and noted specifically:

- .1 that the main challenges addressed by the Contracting Parties to the Barcelona Convention included, but were not limited to:
 - .1 the possible legal, technical, and socio-economic impacts of a situation whereby not all Mediterranean coastal States ratified MARPOL Annex VI by the time of the submission to IMO of the proposal for the possible designation of the Med NO_x ECA;
 - .2 the need to ensure fair competition and avoid market distortions;
 - .3 the political, legal, and technical issues related to ratification procedures;
 - .4 the possible need to align national legislation with MARPOL Annex VI;
 - .5 verification issues and control mechanism actions, including inspections, monitoring of NO_x emissions;
 - .6 the need to identify the necessary financial support and resource mobilisation for the required infrastructure upgrades, notably in existing fleets and ports; and
 - .7 the possible lack of stakeholders’ preparation for implementing a Med NO_x ECA;

- .2 that MARPOL Annex VI and the possible designation of a Med NO_x ECA create opportunities, including for regional, sub-regional and bilateral cooperation, with a view, inter alia:
 - .1 to establishing a regional common understanding of the regulations as well as to ensuring their uniform application and effective enforcement;
 - .2 to significantly reducing air emissions and, in turn, to benefiting the health, environment and tourism in the Mediterranean region; and
 - .3 to developing more energy efficient and cleaner technologies for ships and in ports.

5.7 The Meeting also invited REMPEC, in coordination with relevant regional and international partners, to continue facilitating the exchange of knowledge and best practices on the implementation of MARPOL Annex VI.

AGENDA ITEM 6: EXAMINING THE POSSIBILITY OF DESIGNATING THE MEDITERRANEAN SEA, AS A WHOLE, AS A NO_x ECA UNDER MARPOL ANNEX VI

6.1 Under the first part of this agenda, the representative of Plan Bleu, Mr Constantin Tsakas, presented document REMPEC/WG.62/INF.5. The document provided an analysis of the indirect socio-economic implications of such a designation, particularly on sectors such as fisheries and tourism. It was explained that the document was an independent publication by UNEP/MAP Plan Bleu/RAC, together with a team of consultants, prepared in consultation with REMPEC.

6.2 Mr Tsakas introduced the analysis, which included two policy-oriented technical papers. The first part focused on an expert survey, based on interviews, regarding NO_x controls and their implications on the fisheries sector. The second part examined the potential impacts on tourism in the Mediterranean region. Lists of challenges, opportunities and co-benefits were identified, and the surveys ended with policy recommendations.

6.3 Participants shared their views and sought clarifications on the survey presented by the representative of Plan Bleu, who provided the necessary clarifications, as appropriate.

6.4 The Meeting took note of the comments made and the key findings presented.

6.5 The Head of Office of REMPEC introduced the background to the final Draft Technical and Feasibility Study to examine the possibility of designating the Mediterranean Sea, as a whole, as NO_x ECA under MARPOL Annex VI, hereinafter referred to as the final draft Technical and Feasibility Study. In his intervention reference was made to Working Document REMPEC/WG.62/6 and Information Documents REMPEC/WG.62/INF.3 and REMPEC/WG.62/INF.4.

6.6 REMPEC recalled that COP 22, through Decisions IG.25/16 and IG.25/14, mandated the exploration of the possible designation of the Mediterranean Sea, as a whole, as a Nitrogen Oxides Emission Control Area (Med NO_x ECA) under MARPOL Annex VI. UNEP/MAP and REMPEC were requested to advance this work, including assessing technical, legal, health, and socio-economic aspects.

6.7 In line with these mandates, the Fifteenth Meeting of REMPEC Focal Points (Malta, May 2023), requested the establishment of the NECA TCE and the preparation of a draft Technical and Feasibility Study, together with a draft roadmap, for the 2024–2025 biennium. REMPEC established the NECA TCE in November 2023, with nominations received from 27 Contracting Parties.

6.8 The Head of Office, highlighted that the NECA TCE successfully developed and validated the terms of reference for the final draft Technical and Feasibility Study, coordinated its preparation and review, and assessed existing and ongoing analyses relevant to the potential Med NO_x ECA. The Report of the NECA TCE (REMPEC/WG.62/INF.3) and the final Draft Technical and Feasibility Study (REMPEC/WG.62/INF.4), provided a comprehensive evaluation of the feasibility, impacts, and requirements of a NO_x ECA designation.

6.9 Furthermore, it was highlighted that the final draft Technical and Feasibility Study outlined considerations for decision-making, including:

- whether to propose the Mediterranean Sea as a NO_x ECA;
- national and regional steps needed for ratification, implementation, enforcement, and compliance;
- expected health, environmental, and economic benefits; and
- sequencing and timing of actions, including capacity-building, monitoring and inspection needs, stakeholder engagement, and regulatory adjustments (REMPEC/WG.62/6).

6.10 REMPEC also noted the strong cooperation of the NECA TCE and underscored that its work significantly supports Contracting Parties in preparing informed decisions. The Committee recommended active engagement, allocation of adequate resources, and strengthened regional coordination.

6.11 The Secretariat invited Contracting Parties to consider the NECA TCE's report and the final draft Technical and Feasibility Study, as the basis for the next stages of discussion and decision-making.

6.12 The final draft Technical and Feasibility Study was presented by Mr Aleix Pons and Mr Andrew King from RICARDO, REMPEC Consultants. They presented an overview and key findings of the final draft Technical and Feasibility Study (REMPEC/WG.62/INF.4) into the possible designation of the Med NO_x ECA, which outlined the proposed scope, methodology, impact assessment results, and draft recommendations and roadmap. The Consultants presented the high cost-effectiveness of a Med NO_x ECA introduction compared to previous NO_x ECA introductions and land-based measures, and noted that the highest cost-effectiveness is achieved for the earliest Med NO_x ECA entry into force date (2029). The Consultant conveyed that expected impacts on shipping costs are expected to be minimal (below 0.3% increase), whilst short sea shipping routes may experience higher operational cost increases due to the lower fuel efficiency of smaller coastal vessels (i.e., Ro-Ro and Ro-Pax ships). However, the Consultant communicated an expectation of minimal modal shifts, impacts on commodity prices, and economic activity and employment on the overall maritime sector anticipated from the introduction of the proposed Med NO_x ECA.

6.13 Delegations who spoke mentioned possible challenges or concerns, and benefits were highlighted. Preferences on the different timeline options were expressed. It was also noted that collaboration remains essential to address all concerns raised and challenges foreseen in some shipping sectors.

6.14 Feedback was received from Contracting Parties on the challenges and opportunities for Mediterranean coastal States to adopt the Med NO_x ECA, namely on:

.1 The opportunities and benefits arising from the proposed Med NO_x ECA:

.1 The European Commission reflected that the cost for implementation of the Med NO_x ECA, as presented in the final draft Technical and Feasibility Study was

lower and more manageable than for the Mediterranean SO_x ECA, introduced in 2025. The European Commission noted that the Mediterranean Sea is seen as a “special case” for NO_x ECA implementation, with a differentiated region and approach. However, the European Commission commented that compliance burden would be manageable once initial training has been carried out, and important maritime sectors such as fisheries and tourism would benefit economically;

.2 Croatia commented on the clear environmental and health benefits of the proposed Med NO_x ECA, which outweighs the costs of implementation;

.3 Spain highlighted strong support to the final draft Technical and Feasibility Study’s findings, with the results presented and previous ECAs introduced in the Baltic and North Sea showing the benefits of NO_x ECA introduction;

.4 Italy expressed alignment with comments made by the European Commission and Spain, reiterating the benefits of the proposed Med NO_x ECA introduction for fisheries, tourism and coastal communities, and reflecting that the greatest cumulative NO_x emissions reduction is delivered from early entry into force dates;

.2 Implementation and competitiveness concerns for Med NO_x ECA:

.1 Malta commented that NO_x ECA implementation in the Mediterranean may be more complex than the SO_x ECA, with timelines for adoption and enforcement to be treated cautiously. Malta also reiterated that the Med NO_x ECA should not apply to existing vessels;

.2 Several Contracting Parties commented the potential for an uneven playing field and missed opportunities from either: (i) the Med NO_x ECA not being adopted and enforced across the whole Mediterranean region due to ratification status of Contracting Parties to Annex VI (Malta, Cyprus); and (ii) the Med NO_x ECA being delayed in adopting relative to the implementation of the North-East Atlantic ECA, creating competitiveness concerns around Gibraltar and missed opportunity of ships equipped with Tier III systems but not required to operate them in the Mediterranean Sea (European Commission, Spain);

.3 Slovenia expressed concerns around inspection procedures, training and the capacity of inspectors required for the new test and inspection procedures;

.4 Tunisia noted that the financial impact on funds available to Mediterranean coastal States needs to be considered in future decisions; and

.5 Egypt called for dedicated financial, technical, and technological support for Southern Mediterranean countries, prioritising practical, specialised, and in-person capacity-building activities rather than relying solely on remote webinars.

.3 Adverse impacts on national maritime sectors:

.1 Malta, Cyprus and Greece highlighted concerns that geographical isolation of islands within their national territories, with proportionally greater reliance sea-based trade and short-sea shipping routes, would lead to asymmetric impacts following Med NO_x ECA introduction through higher costs relative to other Mediterranean coastal States with lower reliance on shipping routes;

.2 Morocco and Egypt expressed concerns on the exposure of their ports to economic impacts from the proposed Med NO_x ECA. Morocco highlighted the

Tangier Med port as particularly exposed to international shipping due to the potential cumulative cost for vessel operators, whilst Egypt emphasised potential differences in impacts between North and South Mediterranean States and called for further reflection of the challenges faced by Contracting Parties across the Mediterranean; and

.3 The European Commission highlighted the investment required in adopting and enforcing the Med NO_x ECA has been shown in the final draft Technical and Feasibility Study to provide outsized financial and economic benefits beyond the initial investment costs. The European Commission reiterated the funding made available to coastal Mediterranean states, both through frameworks and bilaterally.

.4 Area of application of the possible Med NO_x ECA:

.1 Egypt supported the exclusion of the Northern entrance and the Northern Waiting Areas of Suez Canal from the area of application of the Med NO_x ECA, following previous COP Decisions;

6.15 Additionally, feedback was received on the final draft Technical and Feasibility Study, namely:

.1 The European Commission recognised the high quality of the methodology and outputs of the draft Study;

.2 Lebanon stated that they were not in a position to endorse the final draft Technical and Feasibility Study and registered reservations in relation to the following aspects:

.1 Most sections were considered to mostly address the situation in EU Member States and to not adequately analyse conditions in non-EU Mediterranean countries. Cited examples of EU-centric focus include short sea shipping analysis limited to EU routes and assumptions based on EU public service obligations (PSO), which do not apply to non-EU countries and modal shift and port competition assessments considered only EU contexts.

.2 The draft Study was not considered to sufficiently fulfil the Terms of Reference, particularly the requirement to: differentiate impacts between EU and non-EU countries and conduct socio-economic impact assessments, including effects of increased transport costs on employment, income, and purchasing power, especially for vulnerable populations.

.3 Egypt expressed concerns in relation to the following aspects:

.1 Need to supplement the final draft Technical and Feasibility Study with more comprehensive, region-specific research that ensures a balanced approach between northern and southern Mediterranean countries, addressing existing disparities, and including additional Egypt-specific modelling given the strategic importance of the Suez Canal;

.2 Insights from the interview with Alexandria Port should be more explicitly reflected in the Study to strengthen national decision-making and safeguard the competitiveness of the Suez Canal and Egyptian ports;

.3 Consideration of national air quality data from Egypt's monitoring network (121 stations, including Port Said and Damietta) into the draft Technical and Feasibility Study to improve accuracy of exposure assessments for Southern

Mediterranean ports, as current NO₂ levels comply with national law and WHO guidelines.

6.16 The statements made by the delegations of Lebanon and Egypt are presented as Annex VII and Annex VIII respectively to the present report.

6.17 The Consultants appreciated the feedback and provided the following clarifications:

.1 The assessment of compliance costs reflects costs experienced by international and domestic shipping when adopting NO_x abatement technologies, direct economic impacts do not include any regional bias;

.2 Macroeconomic impacts in terms of consumer prices, employment and GDP were quantified with a global model and results were provided for each of the individual Contracting Parties;

.3 The case study on short-sea shipping contained in the draft Study, relating to the Barcelona-Civitavecchia route was chosen as a representative route in terms of vessel and operational characteristics. It should be possible to include a second case study connecting non-EU countries to the extent that data could be made available;

.4 The analysis on public service obligation (PSO) contracts and their role to mitigate negative impacts on short sea shipping routes was used as an illustrative example. The analysis can be expanded to recognise PSO as a potential measure to mitigate impacts in non-EU countries as well;

.5 Costs for port authorities related to enforcement and monitoring efforts were quantified but only assessed in a qualitative matter, following the Terms of Reference of the Study. The expectation is however that these costs would be of a lower order of magnitude compared to direct compliance costs for the shipping industry and hence would not affect the cost benefit ratio provided; and

.6 The consideration of air quality concentration levels in specific port areas was not part of the scope of the Study as per the Terms of Reference.

6.18 Following the discussion, the Meeting endorsed the final draft Technical and Feasibility Study and requested the Secretariat to update the draft Study, taking into consideration the discussions and to carry out final editing and any editorial corrections, as appropriate, before submitting it for further consideration by the Seventeenth Meeting of the Focal Points of REMPEC to be held in May 2027. The Meeting requested that the following amendments be incorporated in the Final Technical and Feasibility Study:

.1 Additional case study on impact on short sea shipping route between two non-EU ports to the extent there is data available;

.2 More detailed explanation on the reference to EU legislation/policies and compare, where relevant, with situation in non-EU countries;

.3 Reference and feedback to the input provided by the Port of Alexandria, Egypt during the interviews; and

.4 Additional recommendation to explore the introduction of PSO (or similar) measures in non-EU Contracting Parties, as a means to mitigate impacts on short sea shipping in their ports.

6.19 Following the presentation of the final draft Technical and Feasibility Study, the Consultant presented the indicative roadmap and workplan, for the earliest possible entry into force date for the proposed Med NO_x ECA (2029), developed within the framework of the Barcelona Convention and indicating key milestones, timeline, and actions required to support this designation.

6.20 Several Contracting Parties expressed support for the earliest proposed entry into force date of 2029 (Option 1), reflective of the roadmap presented in the final draft Technical and Feasibility Study:

.1 Italy expressed support for swift action to establish a roadmap for the adoption of the proposed Med NO_x ECA to help with implementation, and indicated support for the earliest entry into force date of 2029 (Option 1) due to the greatest cumulative NO_x emission reduction potential;

.2 Cyprus indicated preference for the earliest entry into force date of 2029 (Option 1) contingent on earlier concerns to be addressed;

.3 The European Commission highlighted their readiness to collaborate with Contracting Parties and showed support for an indicative decision on adoption by the next UNEP/MAP COP in 2027. The European Commission highlighted that an entry into force date of 2029 (Option 1) is preferred, although will seek to understand and agree on a timeline that allows all Contracting Parties to adopt the legislation;

.4 Croatia highlighted the clear environmental and health benefits outweighing implementation costs, and expressed preference for an entry into force of 2029 (Option 1), whilst noting other contracting parties concerns and remaining open to discussions; and

.5 Spain highlighted preference for the earliest adoption of the Med NO_x ECA, reflecting the highest benefits and opportunity, as well as competitiveness concerns with delays to adoption from Tier III-capable ships operating in the proposed North East Atlantic ECA.

6.21 Several other Contracting Parties expressed the need for a longer implementation phase than provided in the draft Roadmap:

.1 Lebanon noted that the delay between proposal and entry into force for previous ECAs has been between 4-6 years, and supports the entry into force date of 2032 (Option 2);

.2 Malta and Greece highlighted their earlier comments on the challenges and potential costs for implementation of the Med NO_x ECA, and indicated support for an entry into force date of 2032 (Option 2);

.3 Morocco commented on the need to balance the introduction of different maritime policies in the same period (i.e., the IMO Net Zero Framework) and to recognise the differentiated development of ports across the Mediterranean, with a risk of over-burdening port authorities with additional procedural requirements. Morocco indicated a preference for entry into force in 2032 (Option 2) considering this;

.4 Egypt noted their earlier comments on acceding to MARPOL Annex VI and adoption of the Med NO_x ECA, and suggested a later entry into force date of 2035 to enable adoption and reduce potential impacts on vulnerable countries;

.5 Tunisia expressed support for an entry into force date of 2032 (Option 2), in line with feedback provided by Lebanon and Morocco.

6.22 In light of the feedback provided by Contracting Parties, the Secretariat produced an amended draft roadmap with a revised timeline which reflected an introduction date of the Med NO_x ECA in 2032 (Option 2 proposed by the final draft Technical and Feasibility Study). The revised Roadmap and Workplan as adopted by the Meeting are contained in the Appendix to Annex IV to this report.

6.23 Finally, in response to queries regarding agreement amongst all Contracting Parties before submission of the proposal for a Med NO_x ECA, the Secretariat confirmed that proposals submitted to the IMO would normally be agreed by all Contracting Parties, as was the case for the Mediterranean SO_x ECA. The Secretariat also clarified that there is the possibility of submitting the proposal for the Med NO_x ECA with only partial Contracting Parties' support if agreement or accession proceedings are not completed. That said, it was also recalled that the UNEP/MAP COP Decision, was to seek designation of a Med NO_x ECA across the whole Mediterranean Sea and remains the primary objective.

6.24 The Chairperson summarised the discussions under agenda item 6 by:

- .1 **acknowledging** that, for the Med NO_x ECA to be effective, it should be implemented and enforced by all Mediterranean coastal States without exception, and that doing so in only parts of the Mediterranean Sea area would compromise the achievement of the projected health and environment benefits as well as would have potential implications, *inter alia* on competitiveness;
- .2 **expressing** appreciation to Plan Bleu for providing an overview of the survey-based analysis of the indirect sectoral repercussions of a potential designation of a Mediterranean NO_x ECA on socio-economic sectors such as fisheries and tourism;
- .3 **welcoming** the findings presented by Plan Bleu, addressing a knowledge gap concerning impacts beyond the direct shipping sector;
- .4 **inviting** Contracting Parties to take these findings into consideration when assessing the potential impacts and co-benefits associated with a Mediterranean NO_x ECA;
- .5 **expressing appreciation** to REMPEC for introducing the background to the final draft Technical and Feasibility Study, recalling the establishment and role of the MAP NO_x ECA Technical Committee of Experts (NECA TCE), in supporting the technical and scientific assessment process;
- .6 **thanking** REMPEC, as Secretariat, and its consultants, for the work they carried out, in close cooperation with the IMO, and for their respective contributions to the preparation the final draft Technical and Feasibility Study;
- .7 **taking note** of the overview provided by REMPEC on the criteria for ECA designation, current NO_x emission control policies and technologies, and the proposed area of application;
- .8 **noting** further the information presented on potential entry-into-force dates, emission sources proposed for control, and the populations and environments at risk from air pollution in the Mediterranean region;
- .9 **noting** also the methodology applied for calculating baseline NO_x emissions and the results obtained for current shipping emissions in the Mediterranean Sea and the impact assessment results, including estimates of air quality and health benefits, economic impacts, and cost-effectiveness ratios in comparison with existing NO_x ECAs and alternative measures;

- .10 **acknowledging** that the results demonstrated the potential for significant environmental and public health benefits associated with the establishment of a Mediterranean NO_x ECA, while also noting the need to consider the implications for the maritime sector and national administrations;
- .11 **taking note** of the key recommendations and the proposed roadmap for the potential designation of the Mediterranean Sea, as a whole, as a NO_x ECA under MARPOL Annex VI;
- .12 **welcoming and endorsing** the final draft Technical and Feasibility Study, including the proposed roadmap and workplan, as contained in **the Appendix to Annex IV** to this report;
- .13 **recommending** taking into consideration the various challenges and diverse capacity building within the region, highlighted during the meeting, that the earliest possible entry into the force date of a possible Med NO_x ECA, should not be earlier than 2032;
- .14 **agreeing**, with amendments made during the discussions, that the final draft Technical and Feasibility Study, including the revised roadmap and workplan, should be transmitted to the Seventeenth Meeting of the Focal Points of REMPEC for consideration and further guidance as contained in the Annex;
- .15 **requesting** the Secretariat to update the draft Technical and Feasibility Study, including the revised roadmap and workplan taking into consideration the discussions and to carry out final editing and any editorial corrections, as appropriate, before submitting it for further consideration by the Seventeenth Meeting of the Focal Points of REMPEC to be held in 2027; and
- .16 **further requesting** the Secretariat to report to the Seventeenth Meeting of the Focal Points of REMPEC on the outcome of the Meeting for consideration and further guidance.

AGENDA ITEM 7: OTHER BUSINESS

- 7.1 No other matter was raised under this agenda item.

AGENDA ITEM 8: CONCLUSIONS AND RECOMMENDATIONS

8.1 The Chairperson invited the Rapporteur, Mr Hatem Feki (Tunisia), to read through the draft conclusions and recommendations that resulted from the Meeting, as prepared by the Secretariat and which had been circulated to all participants, as document REMPEC/WG.62/WP.1, for their consideration, review, amendment, and adoption.

8.2 Following interventions by some delegations to express their views on the draft conclusions and recommendations the Meeting, and after having entrusted the Secretariat to carry out final editing and any editorial corrections that might be identified, as appropriate, the Meeting adopted the Conclusions and Recommendations of the Meeting, as set out in **Annex IV** to the present report, and further requested the Secretariat to report to the Seventeenth Meeting of the Focal Points of REMPEC on the outcome of the Meeting.

ASSESSMENT AND ANTICIPATED OUTCOME

9.1 The summary discussion of the Meeting indicated that all the participants were pleased with the contents of the Meeting. The participants indicated that the Meeting was interesting, productive, and informative. The Meeting allowed participants to share both progress, challenges and opportunities to ratify and implement MARPOL Annex VI and to better understand the process leading to the possible designation of the Mediterranean as a NO_x ECA.

9.2 The IMO's ITCP standard evaluation questionnaire was used in the Meeting to assess the performance of the lecturers and the uptake of information by the participants. 25 participants submitted completed evaluation questionnaires. A summary of the answers to the questionnaires were prepared and is shown in **Annex V** to the present report.

CLOSURE OF THE MEETING

10.1 The Chairperson closed the meeting by extending his sincere appreciation to all participants for their active engagement and valuable contributions. The Meeting thanked REMPEC, for their preparation and organisation of this event and all delegations for their active participation, as well as the consultants for the collaborative efforts and the work they carried out. He also thanked the interpreters and the technicians for their support.

10.2 The Head of Office of REMPEC expressed his appreciation to the Chairperson, Prof. Dr. Enis Omerović, for the smooth running of the proceedings and thanked all REMPEC staff for their work throughout and in preparation of the Meeting. He also thanked all delegations for their active and constructive participation as well as the interpreters and technicians for their support.

10.3 The Chairperson closed the Meeting on Wednesday, 19 November 2025 at 1730 hours.

ANNEX(E) I

LIST OF PARTICIPANTS / LISTE DES PARTICIPANTS

CONTRACTING PARTIES / PARTIES CONTRACTANTES

ALBANIA / ALBANIE

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Head of Legal Sector
Ministry of Environment

Ms Sidorela SPAHIU

Specialist at Chemical Sector
National Environment Agency/ Ministry of Environment

ALGERIA / ALGERIE

M Abdelhak BOUKHAROUBA

Directeur de la Marine Marchande
Ministère de l'Intérieur et des collectivités locales et des Transports
Direction Générale de la Marine Marchande et des Ports

BOSNIA & HERZEGOVINA / BOSNIE & HERZÉGOVINE

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CROATIA / CROATIE

Mr Gordan DOŠEN

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CYPRUS / CHYPRE

Mr Ioannis KATSIARDIS

Marine Surveyor
Shipping Deputy Ministry

EGYPT / *EGYPTE*

Ms Salma ELSONBOSY

Translator & Researcher

Egyptian Maritime Transport & Logistics Sector

Dr Hala IBRAHIM

General Manager

Environmental Affairs Agency

EUROPEAN UNION / *UNION EUROPÉENNE*

Ms Rosa ANTIDORMI

Senior Expert

DG Environment

FRANCE

Mme Noémie DURON

Chargée de mission environnement, transition écologique des navires

DGAMPA

GREECE / *GRÈCE*

Ms Sofia ANGELOU

Head of Pollution Prevention & Cargoes Unit of Ships' Design and Construction Directorate

Hellenic Ministry of Maritime Affairs and Insular Policy

ISRAEL / *ISRAËL*

Mr Sergey BEKETOV

Inspector

Ministry of Transport

ITALY / *ITALIE*

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Staff Officer

Ministry of environment- Marine Environmental Department

Italian Coast Guard Headquarters

Mr Edoardo RUSSO

Capo 1^a Sezione Ufficio 2^o - 2nd Department 1st section Chief

Ministero dell'Ambiente e della Sicurezza Energetica

Reparto Ambientale Marino del Corpo delle Capitanerie di porto

LEBANON / *LIBAN*

Mr Tony ASSAF

Chief of Legal Department
Directorate General of Land and Maritime Transport

Ms Ilham MANSOUR MANSOUR EL KHABBAZ

Chief of Maritime Transport Division
Ministry of Public Works and Transport- Directorate General of Land and Maritime Transport

LIBYA / *LIBYE*

Mr Ashraf ALDUWISH

Head of Air Pollution Unit, Laboratories Department
Ministry of Environment

MALTA / *MALTE*

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Environment Protection Officer
Environment & Resources Authority

Ms Evangelia POULI

Assistant Registrar
Merchant Shipping Directorate
Transport Malta

MONTENEGRO

Mr Aleksandar BOŽOVIĆ

Advisor
Environmental Protection Agency of Montenegro

Ms Nina BULATOVIĆ

Expert in GHG Inventory Development in the field of Industry and Energy
Environmental Protection Agency Montenegro

MOROCCO / *MAROC*

Mme Malika EL BAYOUDI

Cadre supérieur
Ministère de la Transition Énergétique et du Développement Durable

Mme Naoual ZOUBAIR

Chef du Service
Ministère de la Transition Énergétique et du Développement Durable

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Mr Arturo STEFFÉ
Head of division
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Mr Amable CONCHA GUTIÉRREZ
Maritime Safety Inspector
Spanish Directorate General of Maritime Affairs

TUNISIA / *TUNISIE*

Mr Mourad BEN MOUSSA
Expert Contrpoleur Chef
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Mr Hatem FEKI
Directeur Général
Ministère des Transports

TÜRKIYE

Mrs Canan Esin KÖKSAL
Senior Environmental Expert
Republic of Türkiye Ministry of Environment Urbanisation and Climate Change

UNITED NATIONS ORGANIZATIONS / ORGANISATIONS DES NATIONS-UNIES

**INTERNATIONAL MARITIME ORGANIZATION (IMO) / ORGANISATION MARITIME
INTERNATIONALE (OMI)**

Mr Yusuke KAWAI
Junior Professional Officer
Marine Environment Division

OTHER ORGANISATIONS / AUTRES ORGANISATIONS
OTHER PARTNER / AUTRES PARTENAIRES

PLAN BLEU

Dr Constantin TSAKAS
Chief Economist

CONSULTANTS

Ms Marie CAILLERIE

Mr Andrew KING
RICARDO

Mr Aleix PONS
RICARDO

CONFERENCE INTERPRETERS / INTERPRETES DE LA CONFERENCE

SONOVISION

Mrs Hanem ATTIA
Interpreter

Mr Mondher KALAI
Interpreter

SECRETARIAT / SECRÉTARIAT

**REGIONAL MARINE POLLUTION EMERGENCY RESPONSE CENTRE FOR THE
MEDITERRANEAN SEA (REMPEC) / *CENTRE REGIONAL MEDITERRANEEN POUR
L'INTERVENTION D'URGENCE CONTRE LA POLLUTION MARINE ACCIDENTELLE
(REMPEC)***

Mr Ivan SAMMUT

Head of Office

Mr Chris SACCO

Finance / Administrative Assistant

Ms Mary Grace PISANI

Senior Administrative Assistant

Mr Gérard BONA-FONOLL

Administrative Assistant

ANNEX II

AGENDA

Opening of the Meeting

1. Adoption of the agenda
2. The international regulatory framework for preventing pollution from ships
3. Overview of MARPOL Annex VI and NO_x Technical Code
4. Enforcement of MARPOL Annex VI
5. Challenges and Opportunities for Mediterranean coastal States
6. Examining the possibility of designating the Mediterranean Sea, as a whole, as NO_x ECA, pursuant to MARPOL Annex VI
7. Any other business
8. Adoption of the conclusions and recommendations

Closure of the Meeting

ANNEX III**LIST OF DOCUMENTS****WORKING DOCUMENTS**

REMPEC/WG.62/1	Provisional Agenda
REMPEC/WG.62/1/1	Annotated Provisional Agenda and Draft Timetable
REMPEC/WG.62/6	Draft Roadmap for the Possible designation of the Mediterranean as a Nitrogen Oxides Emission Control Area (Med NOX ECA)
REMPEC/WG.62.8	Report of Meeting

INFORMATION DOCUMENTS

REMPEC/WG.62/INF.1	List of Documents
REMPEC/WG.62/INF.2	List of participants
REMPEC/WG.62/INF.3	Report of the MAP NOx ECA Technical Committee of Experts (NECA TCE)
REMPEC/WG.62/INF.4	Final draft Detailed Technical and Feasibility Study to Assess the Relevant Existing and On-going Studies as well as to Examine the Possible Designation of the Mediterranean Sea, as a whole, as an Emission Control Area for Nitrogen Oxides (Med NOx ECA) pursuant to MARPOL Annex VI, including Health and Socio-economic Impacts on the Mediterranean Region and the Individual Contracting Parties to the Barcelona Convention
REMPEC/WG.62/INF.5	Towards a Mediterranean NECA: Contextual Foundations and Sectoral Implications for Fisheries and Tourism

ANNEX IV

CONCLUSIONS AND RECOMMENDATIONS

The Regional Expert Meeting on the Possible Designation of the Mediterranean, as a whole, as a Nitrogen Oxides Emission Control Area (Med NO_x ECA), pursuant to MARPOL Annex VI, hereinafter referred to as “the Meeting”, which was held in Lija, Malta, from 18 to 19 November 2025:

- 1 **expressed appreciation** for the financial support provided by the International Maritime Organization (IMO)’s Integrated Technical Cooperation Programme (ITCP), the Mediterranean Trust Fund (MTF), and the voluntary contribution from the French Ministry for Europe and Foreign Affairs;
- 2 **welcomed** the work and contributions of all the representatives of the Contracting Parties that participated in the work of the MAP NO_x ECA Technical Committee of Experts (NECA TCE), under the coordination of the Secretariat;
- 3 **thanked** the Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea (REMPEC), as Secretariat, and its consultants, for the work they carried out, in close cooperation with the IMO, and for their respective contributions to the preparation and successful organisation of the Meeting;
- 4 **appreciated** the various speakers and facilitators who helped in achieving the objectives of the Meeting;
- 5 **took note** of the information provided on the structure and decision-making process of the IMO, as well as the roles and responsibilities of national Administrations in the effective implementation and enforcement of international maritime instruments;
- 6 **acknowledged** the importance of the International Convention for the Prevention of Pollution from Ships (MARPOL Convention) and its Annexes, as the cornerstone of the international regulatory framework to prevent pollution from ships, and encouraged Contracting Parties to ensure their effective implementation and enforcement at national level;
- 7 **highlighted** that international shipping must be regulated at the global level for any control regime to be effective (e.g. to prevent pollution from ships) and to maintain a level playing field for all ships;
- 8 **noted** with appreciation the objectives of the IMO’s ITCP and recognised its significant contribution to strengthening national and regional capacities for the implementation of IMO instruments;
- 9 **invited** Contracting Parties to continue engaging actively with the IMO under the ITCP and other capacity-building initiatives, and to identify specific areas where technical assistance could further support national efforts;
- 10 **encouraged** continued cooperation between REMPEC, the IMO, and Contracting Parties in promoting the effective implementation of international conventions aimed at preventing pollution from ships, in line with regional and global objectives;
- 11 **acknowledged** the importance of MARPOL Annex VI as a key instrument in addressing air emissions from ships, including the control of sulphur oxides (SO_x) and nitrogen oxides (NO_x), and recognised its relevance to improving air quality and protecting human health and the environment;

- 12 **welcomed** the detailed explanation of the provisions under MARPOL Annex VI, particularly those related to equivalents, notifications, surveys, and certification, as well as the key technical requirements of the NO_x Technical Code, concerning marine diesel engines and compliance with emission standards;
- 13 **encouraged** Contracting Parties to continue their efforts to ratify, implement, and enforce MARPOL Annex VI in order to reduce air pollution from ships and contribute to global and regional environmental objectives;
- 14 **invited** the Secretariat to continue, subject to availability of funds, supporting Contracting Parties, which so request, through technical assistance, training, and capacity-building activities aimed at enhancing compliance with MARPOL Annex VI and other relevant IMO instruments;
- 15 **recognised** the critical roles and responsibilities of national administrations in enforcing MARPOL Annex VI, including those of flag States and port States, and encouraged Contracting Parties to continue strengthening their national frameworks and institutional capacities in this regard;
- 16 **invited** Contracting Parties to make use of the IMO guidelines and reference materials related to the enforcement of MARPOL Annex VI, and to share experiences and best practices to promote consistent implementation across the region;
- 17 **encouraged** the Secretariat to continue supporting Contracting Parties in enhancing their understanding and application of the enforcement provisions of MARPOL Annex VI, through training activities, technical cooperation, and the dissemination of relevant information and materials;
- 18 **noted with interest** the roundtable discussion held on the challenges and opportunities for Mediterranean coastal States in adopting and enforcing MARPOL Annex VI and a possible Mediterranean NO_x ECA, notably;
 - .1 that the main challenges addressed by the Contracting Parties to the Barcelona Convention included, but were not limited to:
 - .1 the possible legal, technical, and socio-economic impacts of a situation whereby not all Mediterranean coastal States ratified MARPOL Annex VI by the time of the submission to IMO of the proposal for the possible designation of the Med NO_x ECA;
 - .2 the need to ensure fair competition and avoid market distortions, taking also into account the possible entry into force of the North-East Atlantic ECA;
 - .3 the political, legal, and technical issues related to ratification procedures;
 - .4 the possible need to align national legislation with MARPOL Annex VI;
 - .5 verification issues and control mechanism actions, including inspections, monitoring of nitrogen oxides (NO_x) emissions;
 - .6 the need to identify the necessary financial support and resource mobilisation for the required infrastructure upgrades, notably in existing fleets and ports; and

.7 the possible lack of stakeholders' preparation for implementing a Med NO_x ECA;

.2 that MARPOL Annex VI and the possible designation of a Med NO_x ECA create opportunities, including for regional, sub-regional and bilateral cooperation, with a view, *inter alia*:

.1 to establishing a regional common understanding of the regulations as well as to ensuring their uniform application and effective enforcement;

.2 to significantly reducing air emissions and, in turn, to benefiting the health, environment and tourism in the Mediterranean region; and

.3 to developing more energy efficient and cleaner technologies for ships and in ports;

- 19 **invited** REMPEC, in coordination with relevant regional and international partners, to continue facilitating the exchange of knowledge and best practices on the implementation of MARPOL Annex VI;
- 20 **acknowledged** that, for the Med NO_x ECA to be effective, it should be implemented and enforced by all Mediterranean coastal States without exception, and that doing so in only parts of the Mediterranean Sea area would compromise the achievement of the projected health and environment benefits as well as would have potential implications, *inter alia* on competitiveness and encouraged all Contracting Parties that are not yet Parties, to complete the ratification to MARPOL Annex VI, by the date of the submission of the MED NO_x ECA proposal to the IMO;
- 21 **expressed** its appreciation to Plan Bleu for providing an overview of the survey-based analysis of the indirect positive sectoral repercussions of a potential designation of a Mediterranean NO_x ECA on economic sectors such as fisheries and tourism;
- 22 **welcomed** the findings presented by Plan Bleu, addressing a knowledge gap concerning impacts beyond the direct shipping sector;
- 23 **invited** Contracting Parties to take these findings into consideration when assessing the potential impacts and co-benefits associated with a Mediterranean NO_x ECA;
- 24 **expressed its appreciation** to REMPEC for introducing the background to the final draft Technical and Feasibility Study, recalling the establishment and role of the MAP NO_x ECA Technical Committee of Experts (NECA TCE), in supporting the technical and scientific assessment process;
- 25 **thanked** REMPEC, as Secretariat, and its consultants, for the work they carried out, in close cooperation with the IMO, and for their respective contributions to the preparation of the final draft Technical and Feasibility Study;
- 26 **took note** of the overview provided by REMPEC on the criteria for ECA designation, current NO_x emission control policies and technologies, and the proposed area of application;
- 27 **noted further** the information presented on potential entry-into-force dates, emission sources proposed for control, and the populations and environments at risk from air pollution in the Mediterranean region;
- 28 **noted** also the methodology applied for calculating baseline NO_x emissions and the results obtained for current shipping emissions in the Mediterranean Sea and the impact assessment

results, including estimates of air quality and health benefits, economic impacts, and cost-effectiveness ratios in comparison with existing NO_x ECAs and alternative measures;

- 29 **acknowledged** that the results demonstrated the potential for significant environmental and public health benefits associated with the establishment of a Mediterranean NO_x ECA, while also noting the need to consider the implications for the maritime sector and national administrations;
- 30 **took note** of the key recommendations and the proposed roadmap for the potential designation of the Mediterranean Sea, as a whole, as a NO_x ECA under MARPOL Annex VI.
- 31 **welcomed and endorsed** the final draft Technical and Feasibility Study as contained in document REMPEC/WG.62/INF.4;
- 32 **recommended**, taking into consideration the various challenges and diverse capacity building within the region, highlighted during the meeting, that the earliest possible entry into the force date of a possible Med NO_x ECA, should not be earlier than 2032;
- 33 **agreed**, with amendments made during the discussions, that the final draft Technical and Feasibility Study, including the revised roadmap, should be transmitted to the Seventeenth Meeting of the Focal Points of REMPEC for consideration and further guidance, as contained in the Appendix.
- 34 **requested** the Secretariat to update the draft Technical and Feasibility Study, including the revised roadmap, taking into consideration the discussions and to carry out final editing and any editorial corrections, as appropriate, before submitting the Final Study for further consideration by the Seventeenth Meeting of the Focal Points of REMPEC to be held in 2027;
- 35 **further requested** the Secretariat to report to the Seventeenth Meeting of the Focal Points of REMPEC on the outcome of the Meeting for consideration and further guidance.

Appendix

Draft Roadmap for the Possible designation of the Mediterranean as a Nitrogen Oxides Emission Control Area (Med NO_x ECA)

Draft Roadmap towards the designation of a Med NO_x ECA

Milestones	Dates	Actions
Regional actions (2025-2027)		
Technical and Feasibility Study	January-December 2025	Completion of a study to address the criteria and procedures for designation of emission control areas laid down in Appendix III to MARPOL Annex VI (this Study) and a draft Roadmap outlining the process leading to a potential proposal to designate the Mediterranean Sea.
Regional Expert Meeting on the possible designation of the Med NO _x ECA pursuant to MARPOL Annex VI	18-19 November 2025	Presentation of the results of the Study and discussion on the submission process for a potential proposal to designate the Med NO _x ECA under MARPOL Annex VI.
Submission of draft IMO proposal to Focal Points of REMPEC	April 2027 <i>Q2 2027 (TBC)</i>	Submission of a Note by the Secretariat (REMPEC), including draft IMO submission and the draft Roadmap, to the 17 th (TBC) Meeting of the Focal Points of REMPEC.
Review and consideration by Focal Points of REMPEC <i>17th (TBC) Meeting of Focal Points of REMPEC</i>	May 2027 <i>Q2 2027 (TBC)</i>	Review and consideration of the Note by the Secretariat (REMPEC), including draft IMO submission and the draft Roadmap. Discussion on: <ul style="list-style-type: none"> • whether or not to submit a proposal to IMO for the designation of the proposed Med NO_x ECA, • the most appropriate timing for such a submission, if any, and • the effective date of entry into force of the proposed Med NO_x ECA, if any.
Submission of draft IMO proposal to MAP Focal Points	July 2027 (TBC) <i>Q3 2027</i>	Submission of a draft COP Decision on the joint and coordinated proposal for the designation of the proposed Med NO _x ECA and the Roadmap to the IMO to the Meeting of the MAP Focal Points. <i>Subject to agreement being reached at the 17th (TBC) Meeting of the Focal Points of REMPEC.</i>
Endorsement of ECA proposal by MAP Focal Points <i>Meeting of MAP Focal Points</i>	September 2027 (TBC) <i>Q3 2027</i>	Approval of the draft COP Decision on the joint and coordinated proposal for the designation of the proposed Med NO _x ECA and the Roadmap towards its designation to the IMO.

Submission of draft IMO proposal to Contracting Parties to the Barcelona Convention and its Protocols	October 2027 (TBC) <i>Q4 2027</i>	Submission of draft COP Decision on the joint and coordinated proposal for the designation of the proposed Med NO _x ECA and the Roadmap towards its designation to the IMO to COP 25 (TBC). <i>Subject to agreement being reached at the Meeting of the MAP Focal Points.</i>
Endorsement of ECA proposal by Contracting Parties to the Barcelona Convention and its Protocols <i>25th (TBC) Meeting of the Contracting Parties (COP 25, TBC)</i>	December 2027 (TBC) <i>Q4 2027</i>	Adoption of COP Decision on the joint and coordinated proposal for the designation of the proposed Med NO _x ECA and the Roadmap towards its designation to the IMO.
Global actions (beyond 2027)		
Submission of the proposal to the IMO	Autumn 2028 <i>Q3 2028 (TBC)</i>	Submission of the joint and coordinated proposal for the designation of the proposed Med NO _x ECA to the IMO. This will include a proposed amendment to MARPOL Annex VI. <i>Subject to agreement being reached at COP 25 (TBC).</i>
Presentation and review of the proposal <i>88th (TBC) session of the IMO's Marine Environment Protection Committee (MEPC 88)</i>	Winter 2029 <i>Q2 2029 (TBC)</i>	<ul style="list-style-type: none"> • Presentation of the joint and coordinated proposal for the designation of the proposed Med NO_x ECA to the IMO, together with a proposed amendment to MARPOL Annex VI); • Assessment of and, agreement to, the said proposal, if any; and • Consideration and approval of a draft amendment to regulation 13 of MARPOL Annex VI related to the designation of the proposed Med NO_x ECA, if any, and request to the IMO Secretary-General to circulate it in accordance with article 16(2) of MARPOL, with a view to adoption at the next session of the IMO's MEPC, if any.

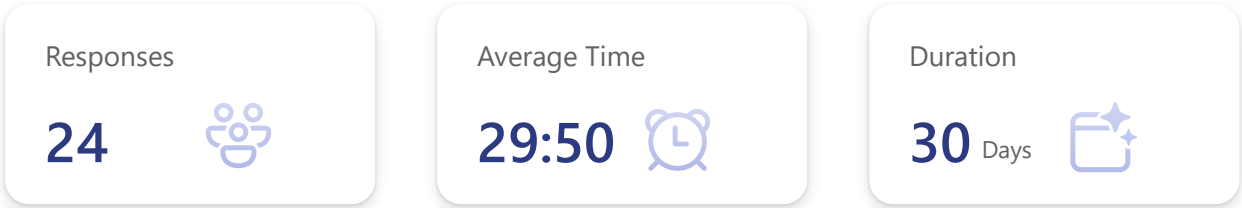
Circulation of the draft amendment to regulation 13 of MARPOL Annex VI	Summer 2029 <i>Q3 2029</i> (TBC)	Circulation of the draft amendment to regulation 13 of MARPOL Annex VI related to the designation of the proposed Med NO _x ECA by the IMO Secretary General to all Members of the Organisation and all Parties, <i>at least six months prior to its consideration.</i> (Provided agreement was reached at MEPC 87 [TBC])
Adoption of the draft amendment regulation 13 of MARPOL Annex VI <i>89th (TBC) session of the IMO's Marine Environment Protection Committee (MEPC 89)</i>	Spring 2030 <i>Q3 2030</i> (TBC)	<ul style="list-style-type: none"> • Consideration and adoption of the draft amendment to regulation 13 of MARPOL Annex VI related to the designation of the proposed Med NO_x ECA, if any; and • Determination of the date of bringing into force of the amendment to regulation 13 of MARPOL Annex VI related to the designation of the proposed Med NO_x ECA, if any, in accordance with article 16(2)(f)(iii) of MARPOL.
Acceptance of the amendment to regulation 13 of MARPOL Annex VI	Winter 2031 <i>Q3 2031</i> (TBC)	Deemed acceptance of the amendment to regulation 13 of MARPOL Annex VI related to the designation of the proposed Med NO _x ECA, if any. In accordance with article 16(2)(f)(iii) of MARPOL: <i>period shall be not less than ten months.</i>
Entry into force of the amendment to regulation 13 of MARPOL Annex VI	Winter 2032 <i>Q1 2032</i>	Bringing into force of the amendment to regulation 13 of MARPOL Annex VI related to the designation of the proposed Med NO _x ECA, if any. In accordance with article 16(2)(g)(ii) of MARPOL: <i>six months after its acceptance.</i>
Entry into force of the Med NO _x ECA	<i>earliest Q1 2032)</i>	Effective entry into force of the Med NO _x ECA, if any.

Notes: Meetings of Contracting Parties (COPs) to the Barcelona Convention; Meeting of Focal Points for UNEP/MAP (United Nations Environment Programme's Mediterranean Action Plan)

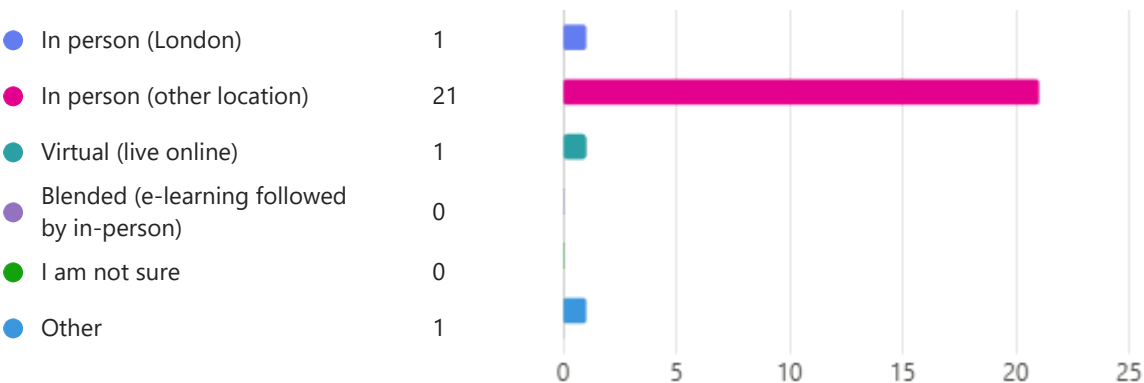
Annex V

EVALUATION QUESTIONNAIRE

Responses Overview Active



1. How was the training/event delivered?



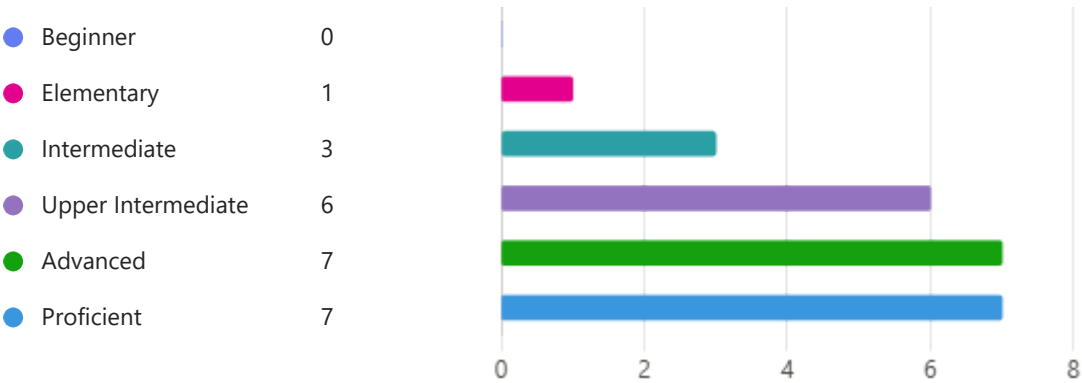
2. Did you experience any IT connectivity issues?



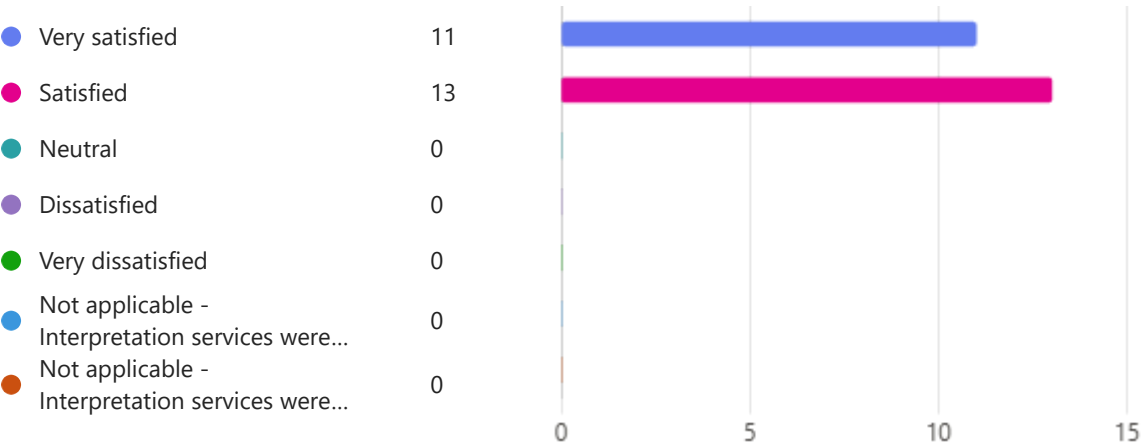
3. Which of the following best describes the reason for the connectivity issues?

IMO's platform crashed	0
Slow/weak network on IMO's side	0
Slow/weak network on my side	0
My network does not support such heavy connections	0
IMO's platform is not supported by the devices that I have available	0
Other	0

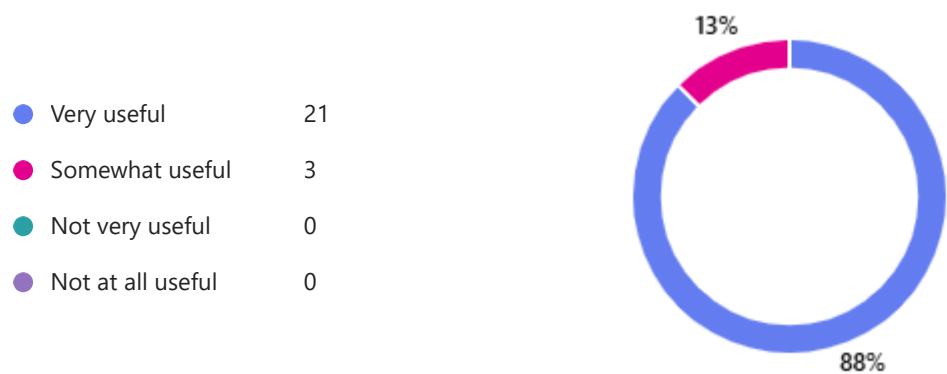
4. How would you assess your level of proficiency in the training/event's primary language?



5. How satisfied were you with the interpretation services provided during the training/event?



6. How useful were the interpretation services in helping you follow the content of the training/event?

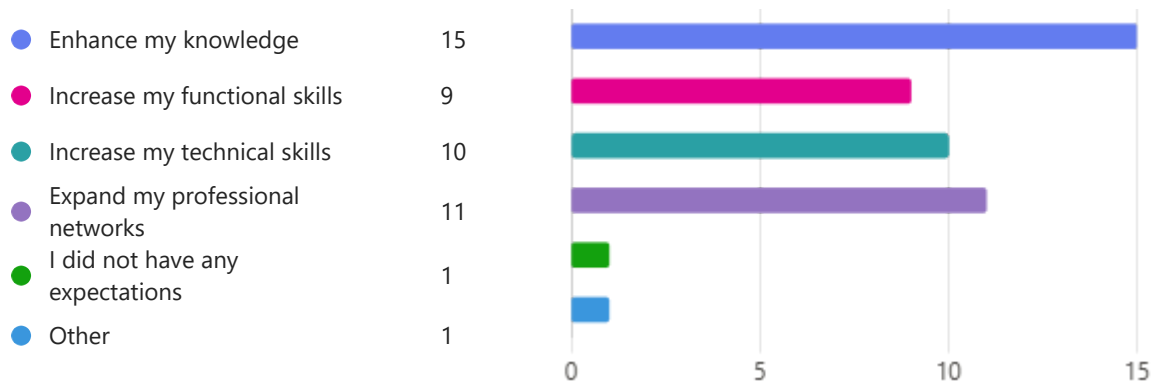


7. Would you like to add any feedback on the interpretation services provided?

2
Responses

Latest Responses
...

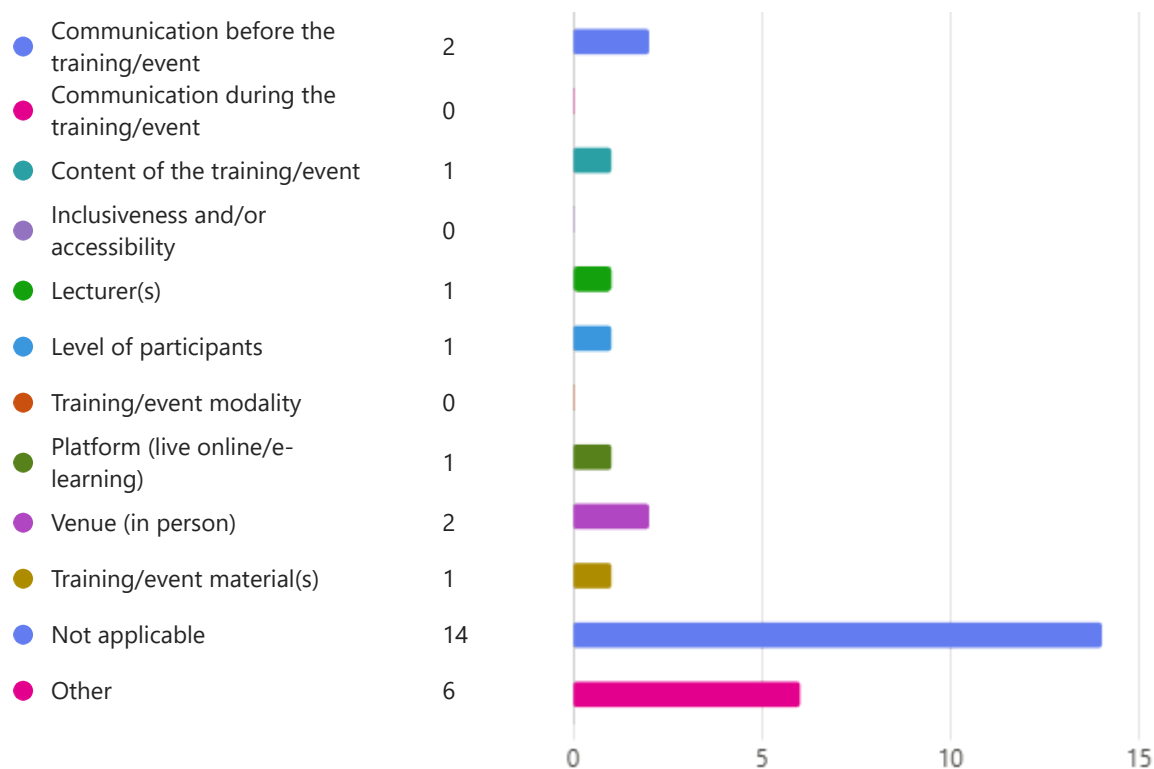
8. Before the event/training, what were you expecting to achieve?



9. After the event/training, using a scale from 1 to 10, where 1 means “Not met” and 10 means “Exceeded”, would you say that your expectations were...



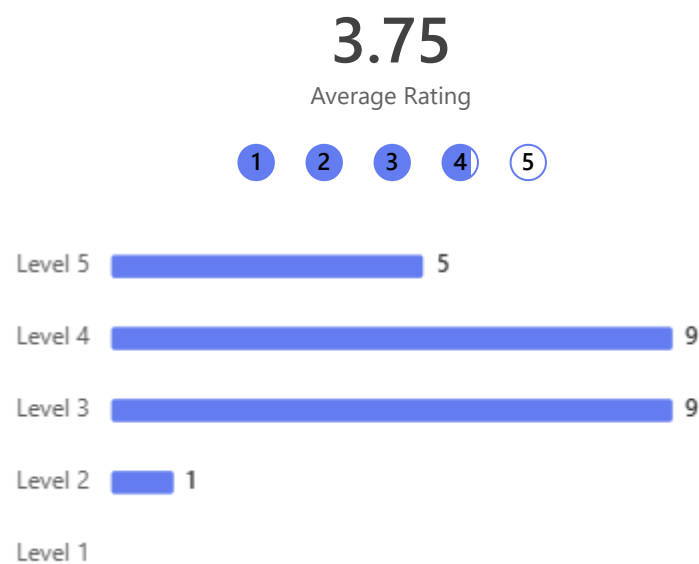
10. Which of the following have failed to meet your expectations?



11. Using a scale of 1 to 5, where 1 means "Limited" and 5 means "Excellent", how would you rate your **knowledge** on the subject areas of training/event?



12. Using a scale of 1 to 5, where 1 means limited and 5 means excellent, how would you rate your **skill set** on the subject areas of training/event?



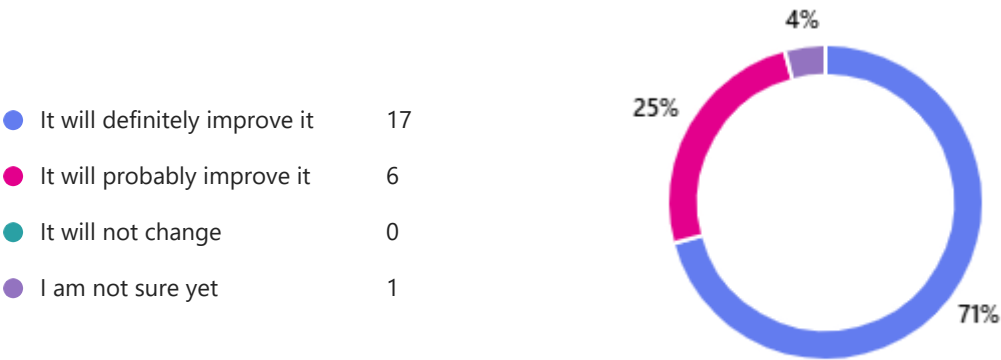
13. Using a scale of 1 to 5, where 1 means "Limited" and 5 means "Excellent", how would you rate your **knowledge** on the subject areas of training/event?



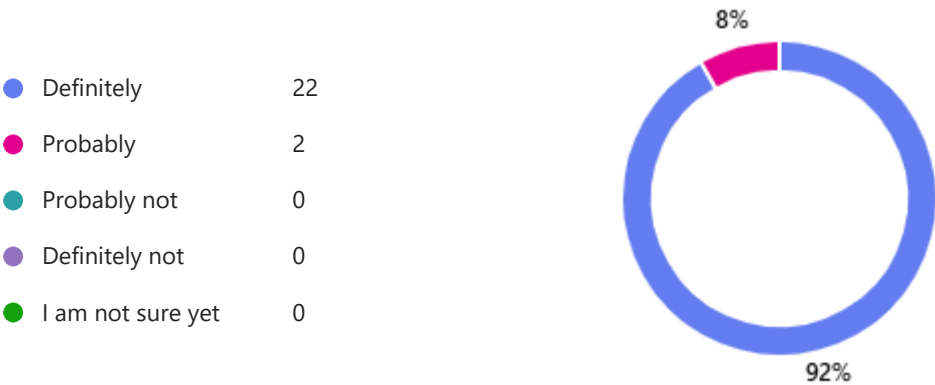
14. Using a scale of 1 to 5, where 1 means "Limited" and 5 means "Excellent", how would you rate your **skill set** on the subject areas of training/event?



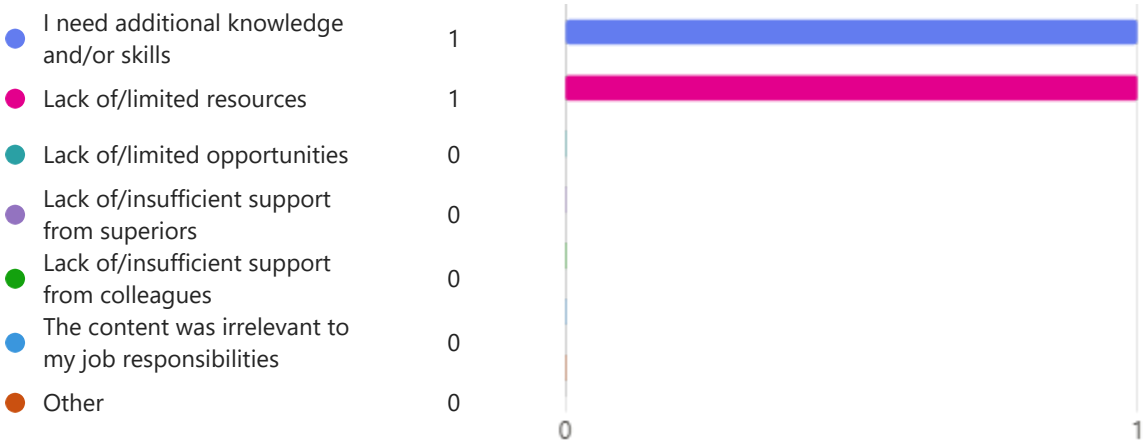
15. Will the knowledge and/or skills acquired through this training/event assist you in the performance of your duties?



16. Will you be able to apply what you learned in your work?

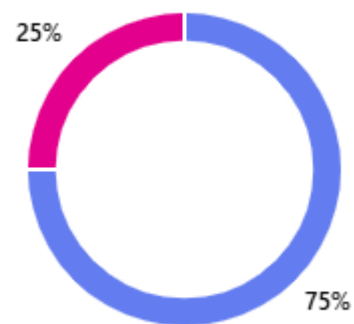


17. What factors could keep you from doing so?



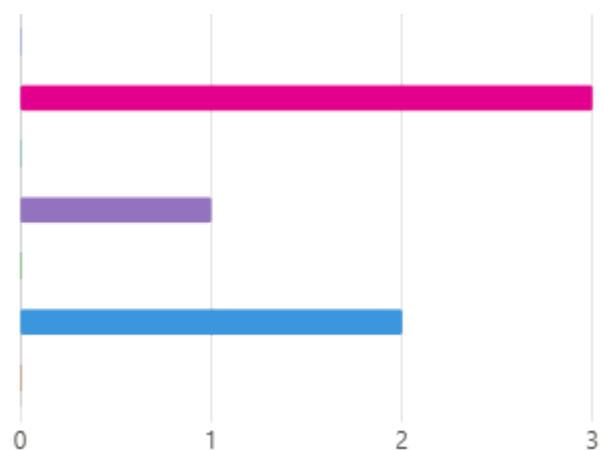
18. How likely are you to transfer the knowledge and/or skills acquired to your colleagues at work?

Very likely	18
Likely	6
Unlikely	0
Very unlikely	0
I am not sure yet	0



19. What factors could prevent you from doing so?

I need additional knowledge and/or skills	0
Lack of/limited opportunities	3
Lack of/insufficient support from superiors	0
Lack of/insufficient interest from colleagues	1
My colleagues are already knowledgeable/skilled	0
Heavy workload	2
Other	0



20. Please indicate whether you agree or disagree with the following statements concerning the content of the training/event:

- Strongly agree

● Agree

● Somewhat agree

● Somewhat disagree

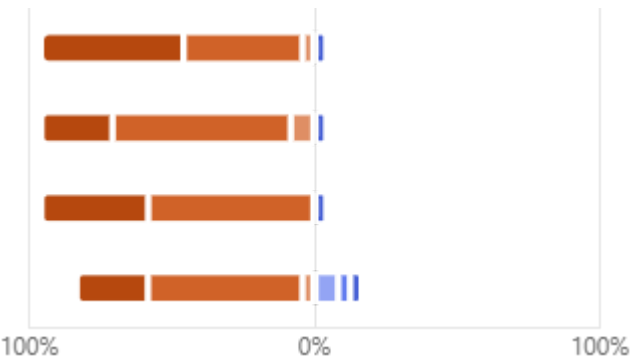
● Disagree
- Strongly disagree

The content was relevant to the priorities of my administration

The content addressed specific challenges and needs that I have been facing in my job

The content was appropriate for the audience

The length was appropriate for the content covered



21. Please indicate whether you agree or disagree with the following statements concerning the materials of the training/event:

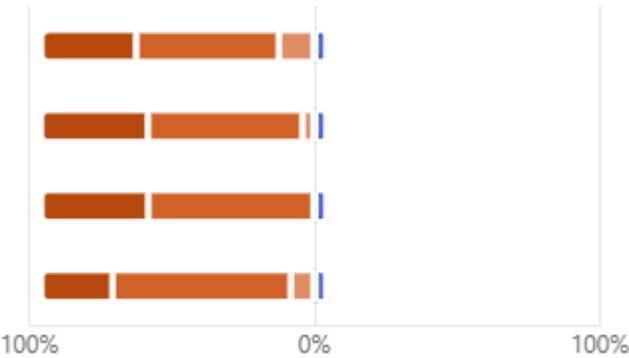
- Strongly agree
- Agree
- Somewhat agree
- Somewhat Disagree
- Disagree
- Strongly disagree

The materials effectively supplemented the lectures

The materials were well-designed and logically structured

The materials were comprehensive and technically sound

The materials were clear and easy to read



22. Please indicate whether you agree or disagree with the following statements concerning the structure of the training/event:

- Strongly agree ● Agree ● Somewhat agree ● Somewhat disagree ● Disagree
● Strongly disagree

The training/event was well-organized and easy to follow

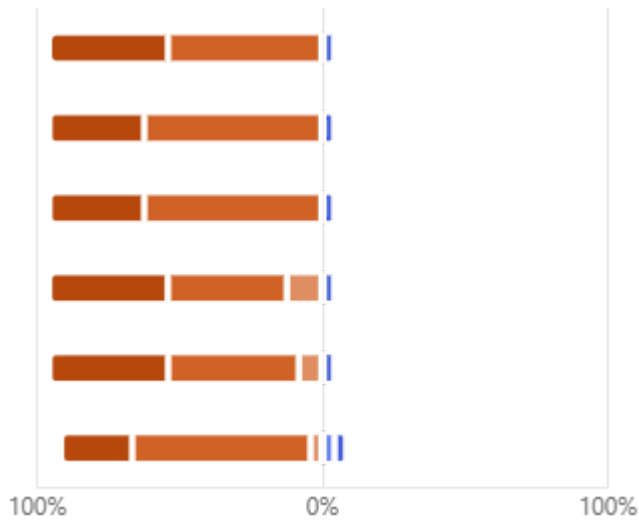
The pace was appropriate for the audience

The delivery modality was convenient and conducive to learning

The venue and/or platform was easy to access

Opportunities were provided for networking and collaboration with colleagues

Opportunities were provided for hands-on practice and application of the concepts learned



23. Were there any lecturers in the training/event?

- Yes 22
● No 2



24. Please indicate whether you agree or disagree with the following statements concerning the lecturer(s) of the training/event:

- Strongly agree

● Agree

● Somewhat agree

● Somewhat disagree

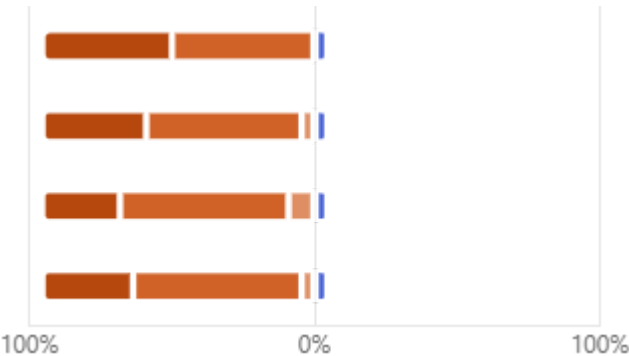
● Disagree
- Strongly disagree

The lecturer(s) demonstrated extensive knowledge to the audience

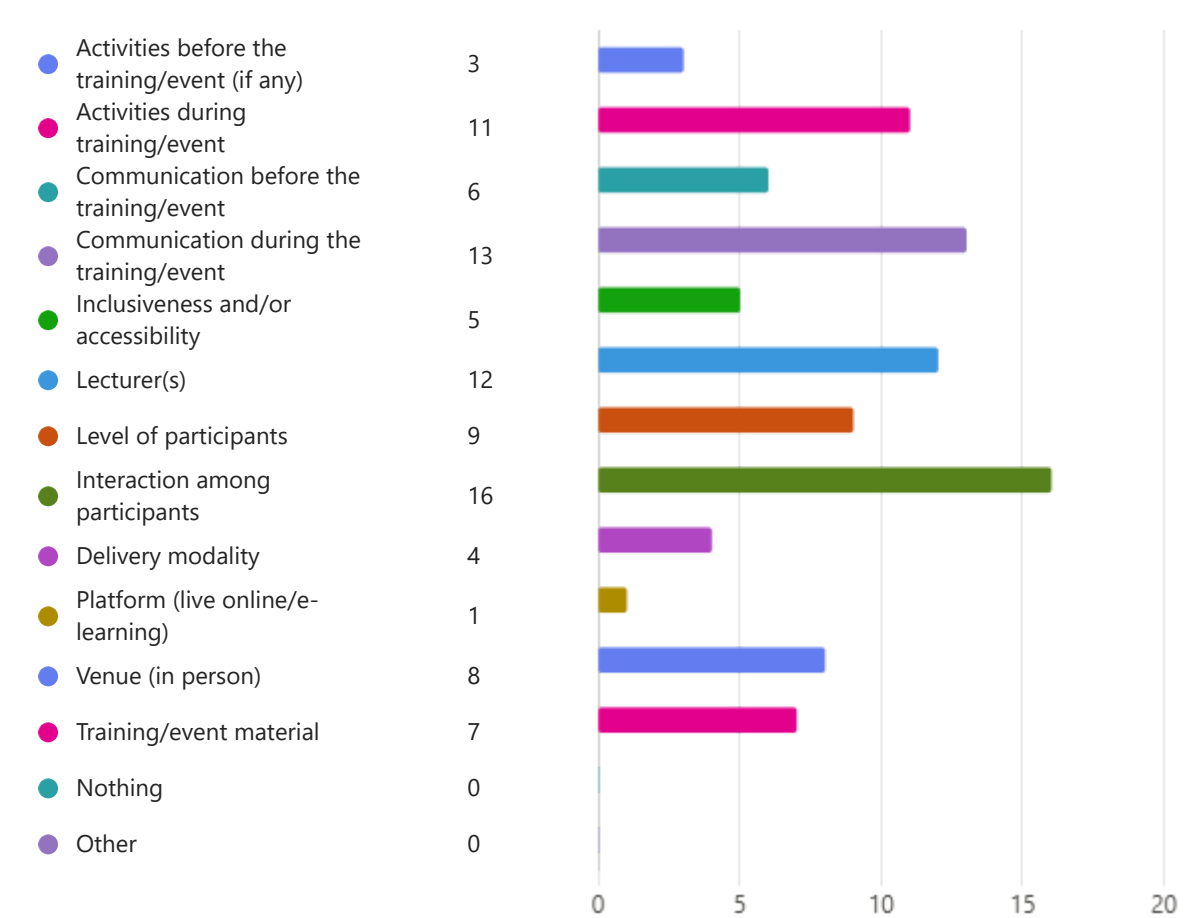
The lecturer(s) effectively engaged the audience and facilitated learning

The lecture(s) effectively addressed questions and concerns raised by the audience

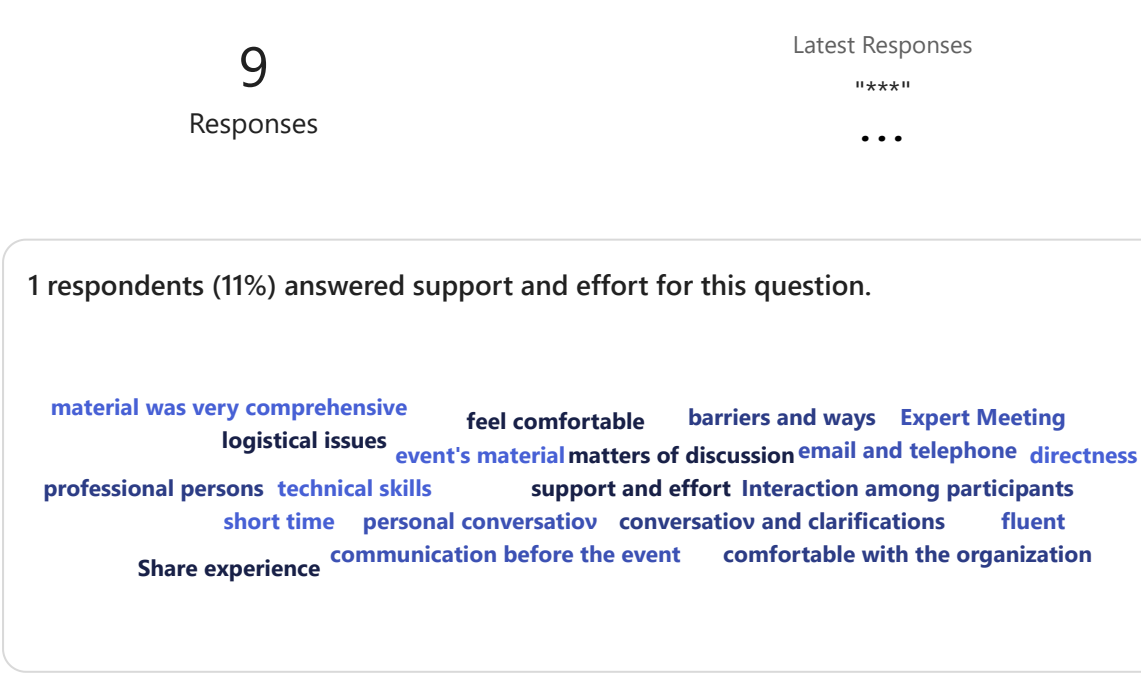
The lecturer(s) provided timely and helpful feedback during the training



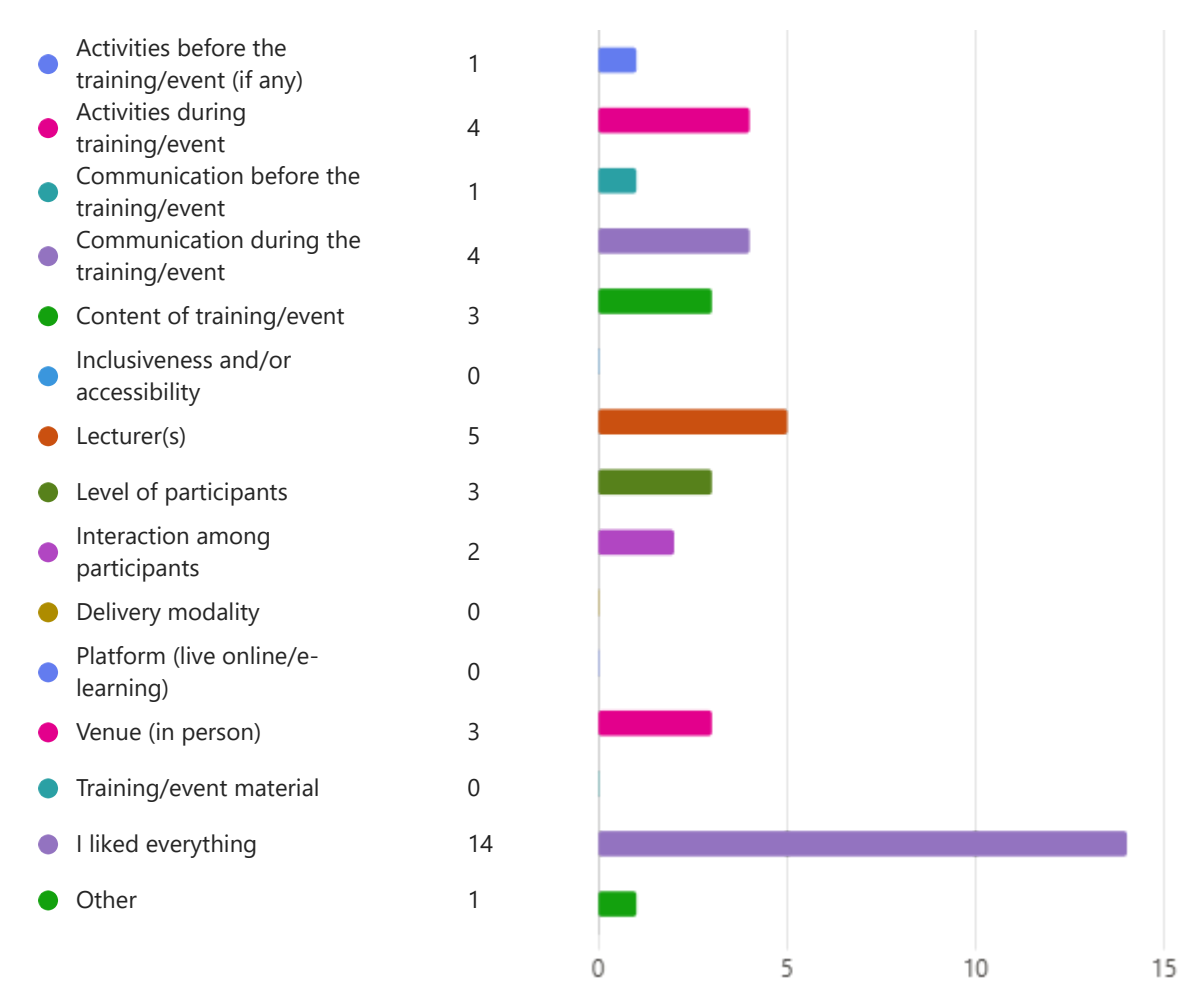
25. What did you like the most?



26. Why did you like it?



27. What did you like the least?



28. Why did you not like it?

6
Responses

Latest Responses

"****"

...

1 respondents (17%) answered participant's belongings for this question.

order venue stress
challenging limited area hard sudden case aspects of the organization
Share experience participant's belongings official activities
difficult area between the lines room belongings or chair agenda
cables noşsei phones activities during the program

29. In your opinion, how could this training/event be improved to make it a more effective learning experience?

9
Responses

Latest Responses

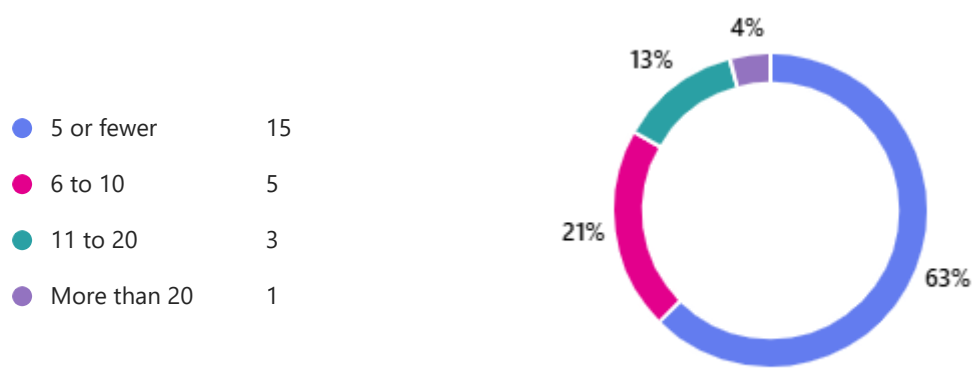
"****"

...

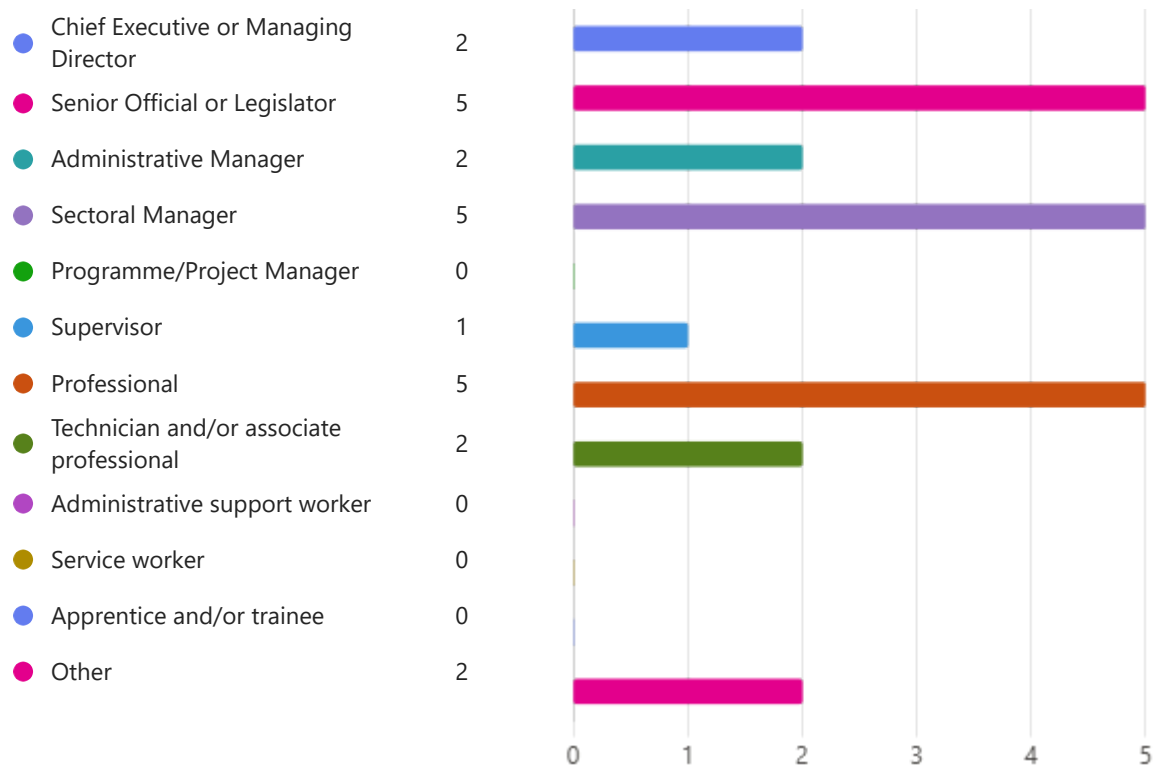
1 respondents (11%) answered practical exercises for this question.

material and documentation
trainings and events quick view to the panels regional examples
online QA actions practical exercises case studies November meeting
MARPOL with optical view feasibility study VI practical cases interactive elements
ongoing trainings participants and representatives relation to the question

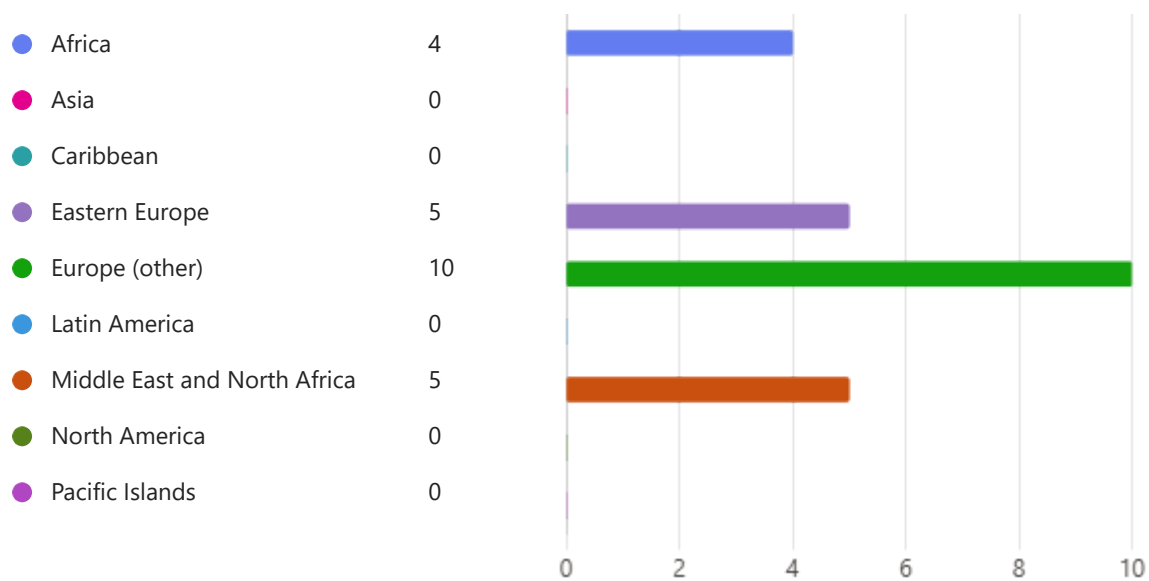
30. How many years of experience do you have in the subject covered by the training/event?



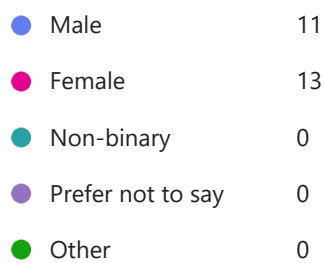
31. Which of the following best describes your current occupation?



32. **Region.** Please indicate the region you are representing in this event.

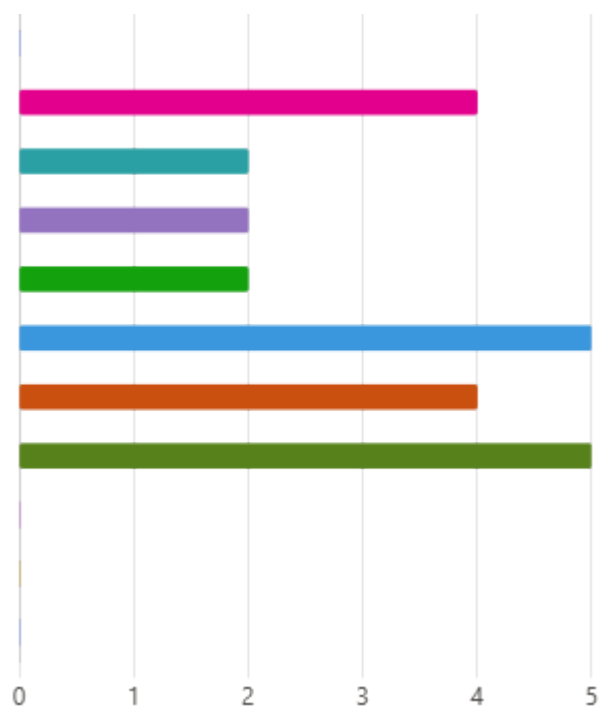


33. **Gender.** How do you identify?



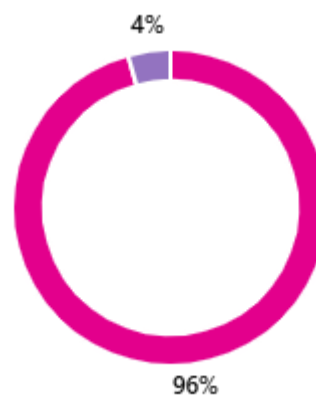
34. **Age.** What age group do you fall in?

18 – 24	0
25 – 29	4
30 – 34	2
35 – 39	2
40 – 44	2
45 – 49	5
50 – 54	4
55 – 59	5
60 – 64	0
65+	0
Prefer not to say	0



35. Do you have a disability which may limit your participation in this type of activity?

Yes	0
No	22
Prefer not to say	0
I am not sure	1



36. To help us ensure that future training/events are accessible to everyone, please let us know what accessibility requirements we might need to take into consideration

0 responses submitted

0
Responses

ANNEX VI**Statement by Tunisia**

Tunisia, a member of the IMO since 1963, has been a party to the MARPOL Convention on the Prevention of Pollution from Ships since 1980 and a party to its 1997 Protocol, adopting its Annex VI since 2011.

Tunisia supports the efforts of the international community to establish clean and sustainable maritime transport.

However, like all Mediterranean countries, it is important for the Tunisian delegation to emphasize the efforts to manage the requirements of the Sulphur Oxide Emission Control Area "ECA Sox Med" taking into account the economic and financial repercussions related to the compliance of its merchant ships, the available port reception facilities and the availability of appropriate hydrocarbons.

These concerns are a high priority, aimed at contributing to the global effort to achieve the Sustainable Development Goals.

ANNEX VII

Statements by Lebanon

The Lebanese Delegation to the Regional Expert Meeting on the Possible Designation of Med NOx ECA pursuant to MARPOL Annex VI, presents its compliments to REMPEC Secretariat and its thanks to REMPEC Team, the consultant and all the members of the MAP NOX ECA Technical Committee of Experts for their efforts to prepare the Final Draft Technical and Feasibility Study regarding possible designation of the Mediterranean Sea, as a whole, as an Emission Control Area for Nitrogen Oxides (Med NOx ECA) pursuant to MARPOL Annex VI.

After reviewing the draft final of the said study and as a result of the discussions that took place during the Regional Expert meeting on the possible designation of the Mediterranean as Med NOx ECA held on 18-19 November 2025 regarding this draft, it became clear to us that the study did not comprehensively cover all relevant countries, focusing primarily and almost solely on EU countries and almost excluding non-EU ones. It can be concluded that the terms of reference were not adhered to, and thus the study examined the findings generated from the assessments and analyses undertaken as part of this study only in EU countries with an exception in Section 6 of the study, without considering other countries concerned outside the European Union in the Mediterranean region thus failing to adhere completely to the terms of reference and without respecting all what was outlined in these terms of reference.

Therefore, we cannot give our approval to a study that has not covered countries outside the European Union, including Lebanon as explained above and in our comments and observations that we have presented in our interventions during the said meeting.

In light of above, we express our reservations regarding the study, its content, and its outcomes. And we would like that our present statement be taken into consideration, our reservations regarding the study and its outcomes be incorporated in the report of this Meeting whereby our statement be included in the Meeting Report 's Annexes, noting that we have detailed a number of observations and comments on some sections of the study in Statement (2), which we also would like to be included in the Meeting Report as one of its Annexes.

Statement (2) by Lebanon

The Lebanese Delegation to the Regional Expert Meeting on the Possible Designation of Med NOx ECA pursuant to MARPOL Annex VI, expresses its gratitude to REMPEC, its Secretariat and the whole team for organizing this important expert meeting that has served as a platform for delegations present in the meeting to discuss in depth the Draft Final Technical and Feasibility Study on the possible designation of the Mediterranean Sea as an Emission Control Area for Nitrogen Oxides (Med NOx ECA) pursuant to MARPOL Annex VI and to give their views pertaining to the anticipated challenges to the implementation of this ECA. The Lebanese Delegation would like also to extend its thanks to the consultant and all the members of the MAP NOx ECA Technical Committee of Experts for their efforts in preparing this Draft final.

After reviewing the final draft of the said study, we have found that most of its sections addressed the situation in European countries and did not examine and analyze the situation of non- EU countries. Therefore, the study did not identify the actual impacts on the economies of non-EU countries, nor any major risks or repercussions related to possible indirect impacts on their economies and citizens as a result from the implementation of Med NOx ECA.

Thus, this study has not reflected the whole picture of the situation and conditions of all countries involved in the designation of the Mediterranean Sea as Med NOx ECA and the impacts of this designation on all these countries which means that it has partially covered its scope outlined in the Detailed Technical Terms of Reference where we can read the following in the Paragraph 4 of the Annex to the Report of the MAP NOx ECA Technical Committee (NECA TCE) entitled Assessment of the Health, Environmental (air quality), and Socio-Economic Impacts on the Mediterranean region and the individual CPs arising from the Designation of the Med NOx ECA:

“The Consultant shall undertake a socio-economic impact evaluation to assess the impacts on the Mediterranean region and the individual CPs arising from the designation of the Med NOx ECA. And the analyses shall be conducted at the level of the Mediterranean region, as a whole. Whenever practicable, the analyses shall differentiate impacts on countries or groups of countries with different specificities, including, but not limited to:

.1 countries having ratified MARPOL Annex VI versus countries not having ratified it;

.2 countries that are Member States of the European Union versus countries that are not EU Member States;”

In addition to the above, we can read in page 6 -paragraph 4.4 of the same above-mentioned document the following:

“The additional socio-economic impact evaluation shall include:

(Item no 2.2) “An analysis of the impacts of increased prices of transport on the purchasing power of citizens, in particular, citizens pertaining to a low socio-economic status and covering at least key economic parameters of employment, income and consumer purchasing power.”

This text, which falls within the detailed terms of reference for the study, clearly demonstrates the necessity of analyzing the impacts of increased prices of transport on the purchasing power of citizens, especially those with low socio-economic status, including key economic indicators of employment, income, and consumer purchasing power. This means that the study should have addressed these analyses of the impacts of increased prices of transport on the purchasing power of citizens in countries facing difficult economic and social conditions, as is the case in Lebanon. Unfortunately, this section of the study's terms of reference has not been taken into consideration.

We will present some examples taken from the study to illustrate what has been mentioned above regarding this study:

1st Example: From Paragraph 5.4.2: Impacts on Short Sea Shipping

The study has considered the cost impact on a specific ferry short Sea Shipping connection in the Mediterranean Sea by selecting the ferry (Ro-Pax) connection between Barcelona and Civitavecchia. It should be noted that the study should be more comprehensive and more realistic by selecting two (2) connections, one between two EU countries as is the case in the study and another one between two non-EU countries or between one EU Country and one non-EU country on the Mediterranean Basin which are involved in the study.

Moreover, the study has gone further in addressing the expected price increase by mitigating this cost impact on the ticket price of a short sea shipping connection between EU countries when saying that most short sea shipping connections to small islands and remote areas particularly in EU countries are protected by public service obligations (PSO) that fix the maximum price and minimum supply of these services (e.g. minimum frequency and capacity). As such, connectivity impacts from the additional OPEX would be largely mitigated by PSO contracts.

This shows more that the study has focused on EU countries rather than on all countries on the Mediterranean basin, EU and non-EU countries, as non-EU countries do not benefit from this protection offered by PSO.

2nd Example: From Paragraph 5.4.3: Impacts on Modal Shift

The study addresses the modal shift issue from the EU countries angle neglecting any diagnosis of the situation in non-EU countries or any analysis of this issue in these countries especially when stating the following: “Stakeholders in the interviews recognized that while modal shift, particularly from short sea shipping to road transport, is a risk that needs to be closely monitored, the Med NOx ECA by itself is not likely to drive any significant shift to road transport, in general terms. Modal shift effects would be mostly associated with wider climate and environmental policies concerning the shipping sector such as EU ETS (EU Emissions Trading System) and Fuel EU.”

3rd Example: From Paragraph 5.4.4: Impacts on Port Competition and Re-routing

In the section of the study entitled “Impacts on port competition and re-routing” (Paragraph 5.4.4), it is stated the following: “The findings from the qualitative analysis are reinforced by the interviews with stakeholders, who believe that re- routing due to the NOx ECA is unlikely as the costs of changing shipping routes are high and the presence of existing ECAs in Northern Europe and the Atlantic limits opportunities for rerouting.” This raises the question or concern of whether these interviews conducted with stakeholders might have not included stakeholders from non-EU countries.

Moreover, it is stated the following: “Ferry routes to remote or island regions are also not expected to be affected as they are often protected by public service obligations (PSO), subsidies, or exemptions due to their essential nature.”

This statement or conclusion applies to EU countries and not to all countries concerned.

However, we can find an exception to what has been highlighted above, which exists in Part 6 of the study related to Alternative Measures for Land-Based Sources whereby the study has addressed the land-based NOx emissions data analyzed by the Centre on Emission Inventories and Projections (CEIP) and its assessment covered EU and non-EU countries, in addition to the assessment of Land-Based measures and their implementation in both EU and non-EU countries.

In light of the above, it can be concluded that these terms of reference were not adhered to, and thus the study examined the findings generated from the assessments and analyses undertaken as part of this study only in EU countries with an exception in Section 6 of the study, without considering other countries outside the European Union in the Mediterranean region thus failing to adhere completely to the terms of reference and to respect all what was outlined in these terms of reference.

As Lebanese delegation and in light of the comments and observations we have presented above and in our interventions during the meeting, we would like to express our reservations regarding the study and its approach to assessing and analyzing the situations of the countries concerned and the implications of implementing Med NOx ECA on the economy, the maritime sector and the shipping industry, in addition to its outcomes as the study focused primarily on European countries and not on all concerned countries, the non-EU ones. Therefore, we regret to say that we find ourselves out of the scope of this study and we cannot give our approval to it.

We kindly request to incorporate this statement in addition to the statement pertaining to our reservations in the report of this meeting of experts as annexes.

ANNEX VIII

Statement by Egypt

1) Area of Application

We reiterate the exception of the Northern entrance and the Northern Waiting Areas of Suez Canal from the area of application of (Med NOx ECA).

2) Entry into force date

Egypt calls for a gradual and equitable transition that duly considers the economic and technical gaps between Northern and Southern Mediterranean countries, ensuring that no State is left behind, while maintaining the competitiveness of our Egyptian ports and the Suez Canal compared to alternative routes.

Therefore, we suggest the latest entry into force date, **which is 2035**, in order to grant countries—particularly those in the southern Mediterranean—as well as shipowners, sufficient time to adequately adjust their conditions and comply with the new requirements. This also allows for consensus within the International Maritime Organization on medium-term measures related to the Net-Zero framework NZF.

3) We propose that the current Technical and Feasibility Study be supplemented with more comprehensive and region-specific research that duly considers and maintains a balanced approach between Northern and Southern Mediterranean countries, while addressing existing disparities as well as incorporating additional Egypt-specific modeling in view of the strategic importance of the Suez Canal. Furthermore, it is imperative that the challenges and concerns raised during **Ricardo's interview with Alexandria Port** be clearly incorporated and adequately addressed in the revised version of the study, in order to provide more robust support for national decision-making and to preserve the competitiveness of the Suez Canal and Egyptian ports.

4) We emphasize the critical need for dedicated financial, technical, and technological support, particularly for Southern Mediterranean countries, with a strong focus on delivering practical, specialized, and in-person capacity-building activities rather than relying solely on remote webinars, in order to effectively enable these countries to meet and comply with regional obligations.

5) Egypt operates a nationwide ambient air quality monitoring network consisting of 121 monitoring stations across the country. This network includes dedicated stations located at Port Said Port and Damietta Port, both of which continuously measure nitrogen dioxide (NO₂) levels. Recent measurements confirm that NO₂ concentrations from maritime activity at these locations comply with Egypt's ambient air quality limits set by law No 4/1994 and its subsequent amendments and generally align with WHO guidelines for both short-term and annual exposure. Therefore, it is essential that the Feasibility Study incorporates locally measured data from these Egyptian monitoring stations instead of relying solely on regional modelling outputs. Integrating these national datasets will enhance the accuracy of exposure assessments for Southern Mediterranean ports and provide a more accurate reflection of actual on-ground conditions.
