Charting the 2025 maritime regulatory landscape

Reflecting the ongoing emphasis on environmental protection and sustainable maritime operations, this year sees the implementation of crucial regulations across various domains, from emissions control and fuel efficiency to ship recycling and safety standards. These changes underscore the industry's continuous evolution towards a more environmentally responsible and sustainable future.

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Below, we look at several of the more important domestic and international regulations with amendments that enter into force in 2025. We encourage members and clients to ensure that their crew and shore staff are familiar with them prior to their entry into force. It is believed that there is a global trend for environmental regulations to become stronger every year, so it will be necessary to continue investigating these trends.

1 January 2025

MSC.539(107) **: IMSBC Code amendments (07-23)**

These amendments were initially voluntary, effective 1 January 2024, but became mandatory on 1 January 2025. Key changes include

• Declaration Form Updates: The declaration form was revised to require shippers to provide "bulk density" information.

• DRI (D) schedule: Direct Reduced Iron (DRI) was categorized into Groups A, B, and MHB. In addition to liquefaction risks, DRI cargoes present hazards similar to other DRI types, such as self-heating, fire and explosion risks, the emission of flammable hydrogen gas, and the depletion of oxygen within cargo holds. Given the inherent risks, it is strongly recommended that a qualified cargo technician be appointed to oversee the handling and transportation of DRI cargoes.

MSC.1/Circ.1665 **: STCW electronic certificates for seafarers**

Electronic seafarers' certificates are permitted to be issued provided minimum information is [available] to the Administration in accordance with the STCW. This change reflects the maritime industry's ongoing digitalization efforts, offering an alternative to traditional paper-based certificates. Verification during Port State Control Inspections may be obtained through an application, approved stored data, an approved unique tracking number, an approved seafarer identification number, a Quick Response (QR) code, any combination of these items, or any other method deemed suitable for this purpose and approved by the Administration. The unique tracking number and other relevant data for verification should always be readily available

MEPC.381(80) **and** MEPC.382(80) **: MARPOL Special Areas for Annex I and V**

From 1 January 2025, new restrictions will be applied to ships regarding the discharge of oil and oily mixtures within the Red Sea and Gulf of Aden Special Areas, and regarding the discharge of garbage in the Red Sea Special Area. For both Annex I and Annex V, the Red Sea Special Area is defined as the Red Sea proper including the Gulfs of Suez and Aqaba bounded at the south by the rhumb line between Ras si Ane (12°28'.5 N, 043°19'.6 E) and Husn Murad (12°40'.4 N, 043°30'.2 E). For Annex I, the Gulf of Aden Special Area is defined as the Gulfs area meaning the sea area located north-west of the rhumb line between Ras al Hadd (22°30' N, 059°48' E) and Ras al Fasteh (25°04' N, 061°25' E).

MSC.1/Circ.1572/Rev.2 **: Revised Unified Interpretation of inspection and**

maintenance of means of access

The IMO adopted MSC.1/Circ.1572/Rev.2, an amended circular that provides a unified interpretation of SOLAS II-1/3-6 and its associated technical regulations (MSC.158(78)). This circular addresses the means of access requirements for oil tankers of 500 gross tonnage and above, as well as bulk carriers (as defined in SOLAS IX/1) of 20,000 gross tonnage and above, where the keel was laid on or after 1 January 2005. Furthermore, the revised circular updates the provisions related to the inspection intervals for these means of access and the associated record-keeping requirements. Owners and managers are advised to check if the 'Ship Structure Access Manual' requires to be updated.

MEPC.324(75) **: Energy Efficiency Design Index (EEDI) Phase.3**

EEDI Phase 3 was originally scheduled to take effect in 2025, but was brought forward to 1 April 2022 for certain types of ships. The remaining vessels larger than 400 gross tons (GT) will be required to comply with EEDI Phase 3 starting1 January 2025.

IMDG Code Amendment 42-24

Contracting governments to the SOLAS Convention have the option to voluntarily implement Amendment 42-24, in part or in whole, beginning 1 January 2025. This voluntary implementation precedes the amendment's mandatory entry into force on 1 January 2026. This update includes revised requirements for charcoal , with new Special Provisions and amended documentation to mitigate fire incidents and prevent misdeclaration. It also introduces new requirements for data loggers, sensors, and trackers attached to cargo transport units. Additionally, Class 9 has been expanded to include sodium-ion batteries and lithium/sodium battery-powered vehicles, with the introduction of UN 3556 for lithium-ion battery-powered vehicles.

FuelEU Maritime Regulation

The Fuel EU Maritime Regulation, effective 1 January 2025, complements the EU ETS by mandating the gradual decarbonization of shipping fuels. It aims to reduce greenhouse gas emissions across the fuel lifecycle (well-to-wake), including carbon dioxide, methane and nitrous oxide, contributing to EU climate goals. The regulation mandates zero-emission operations at berth for certain vessels and encourages innovation by allowing for flexible fuel choices and a voluntary pooling mechanism for compliance. The scope considers vessels above 5,000 gross tonnage, calling EEA ports, no matter what flag they fly (EU/non-EU), and includes:

• 100% of the energy used from ships calling at an EU/EEA port for voyages within the EU/EEA (intra-EU)

• 50% of the energy used from voyages to or from EU ports (extra-EU/EEA)

• 100% of the energy used when ships are at berth in EU/EEA ports.

From 2025, shipping companies will report their emissions also through THETIS

MRV operated and maintained by EMSA, acting as one-stop shop for companies. It is worth mentioning that starting in 2025, the EU ETS regulation will evolve to account for 70% of emissions, compared to 40% in 2024. FAQ prepared by European Commission on FuelEU Maritime can be accessed here .

Relevant Gard articles on this regulation:

• FuelEU: The impact on vessel sale and purchase contracts

• FuelEU: BIMCO's new clause and its implications

• Getting ready for FuelEU Maritime

Regulations in California Port **, USA**

Starting 1 January 2025, California's At-Berth Regulation (ABR) requires certain ships to use a CARB-Approved Emission Control Strategy (CAECS) to reduce emissions while in port. The regulation applies to tankers in the Port of Los Angeles and Port of Long Beach, and to Ro-Ro vessels at all California ports. Regulated emissions are nitrogen oxide (NOx), particulate matter 2.5 (PM 2.5) and reactive organic gases (ROG). The primary regulated parties are the vessel operators, terminal operators, California ports and CAECS operators.

1 February 2025

MEPC.369(80) **: New record-keeping and reporting requirements**

From 1 February 2025, the amendments outlined in Circular BWM.2/Circ.80 and Resolution MEPC.369(80) will standardise procedures for completing the Ballast Water Record Book (BWRB). These include updated reporting forms and guidelines for logging operations under challenging water conditions. Ships with approved BWM plans must comply by implementing codes A to H, alongside item-specific recording requirements for various ballast water operations.

1 May 2025

MEPC.361(79) **: Mediterranean Sea – New ECA for SOx**

As of 1 May 2025, the Mediterranean Sea will effectively become an Emission Control Area (ECA) for sulphur oxides (SOx) under MARPOL Annex VI Regulation 14. This implies that from then on when operating in the Mediterranean Sea, the sulphur content of the fuel used on board shall not exceed 0.10%, unless using an exhaust gas cleaning system (EGCS) ensuring an equivalent SOx emission level.

25 June 2025

Hong Kong International Convention on the Safe and Environmentally Sound Recycling of Ships, 2009

The Convention is now finally set to enter into force on 25 June 2025, two years after Liberia and Bangladesh acceded to the Convention, which triggered the entry into force mechanism. the development and maintenance of an Inventory of Hazardous Materials, which identifies the amount and location of hazardous materials onboard a ship, will be required for all ships over 500GT. Gard's 'The Hong Kong Convention – will it be a game changer?' can be accessed here .

IMO has also issued guidance regarding the implementation of the Hong Kong and Basel Conventions. It guides the member states as follows:

• States Party to the Hong Kong Convention but not the Basel Convention: Apply the requirements of the Hong Kong Convention.

• States Party to the Basel Convention but not the Hong Kong Convention: Apply the requirements of the Basel Convention, including its Ban Amendment, if they have consented to be bound by it.

• States Party to both the Hong Kong and Basel Conventions: Apply the Hong Kong Convention for transboundary ship recycling movements, with the understanding that the Basel Convention provisions should not impede these movements, even if the State has consented to the Ban Amendment

A useful article by BIMCO on this topic can be accessed here , where they conclude that *"The provisional guidance by the IMO will not resolve the fact there is still a patchwork of different regulations that can cause contradicting requirements being put on one and the same ship"*.

1 July 2025

Ban on discharge of wastewater by Finland

Finland will completely prohibit the discharge of all wastewater from ships within its territorial waters. This ban encompasses all cargo ships and prohibits the release of any wastewater, including greywater and blackwater, into the Baltic Sea. This significant step aims to enhance the ecological health of the marine environment. Notably, a ban on the discharge of scrubber washwater within Finnish territorial waters came into effect on 1 January 2025.

1 August 2025

MEPC.385(81) **: MARPOL Annex VI**

Revisions to MARPOL Annex VI clarify the definition of gas fuels and exempt them from onboard sampling requirements. Bunker Delivery Notes (BDNs) must now include information for gas/low flashpoint fuels. Replacing a steam engine with a

diesel engine is now classified as a major conversion, necessitating compliance with NOx emission standards. If a Tier III engine is not feasible, a Tier II engine may be used with flag state reporting to the IMO. The IMO can now share fuel consumption data with research entities, subject to confidentiality and company consent. This enhanced data sharing will facilitate more in-depth analysis of fuel consumption and voyage data. Vessels exceeding 5,000 GT may have to update their SEEMP Part II to accommodate these new data collection requirements.

1 October 2025

MEPC.383(81): Ballast Water Management Convention on The Use of Electronic Record Books

Amendments introduce the following new requirements for utilizing electronic Ballast Water Record Books (eBWRBs):

IMO Performance Standard Compliance: The eBWRB must be approved as compliant with IMO performance standards (refer to Guidelines for the use of Electronic Record Books under the Ballast Water Management Convention, IMO Resolution MEPC.372(80)).

• Ship-Specific Declaration: Ships must carry a declaration onboard confirming that the installed eBWRB meets IMO guidelines.

• Ship-Specific Approval: Ships utilizing an eBWRB require ship-specific approval, either by their Flag State Administration or by an organization recognized by the Flag State.