



Regulatory Update

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October 07, 2025



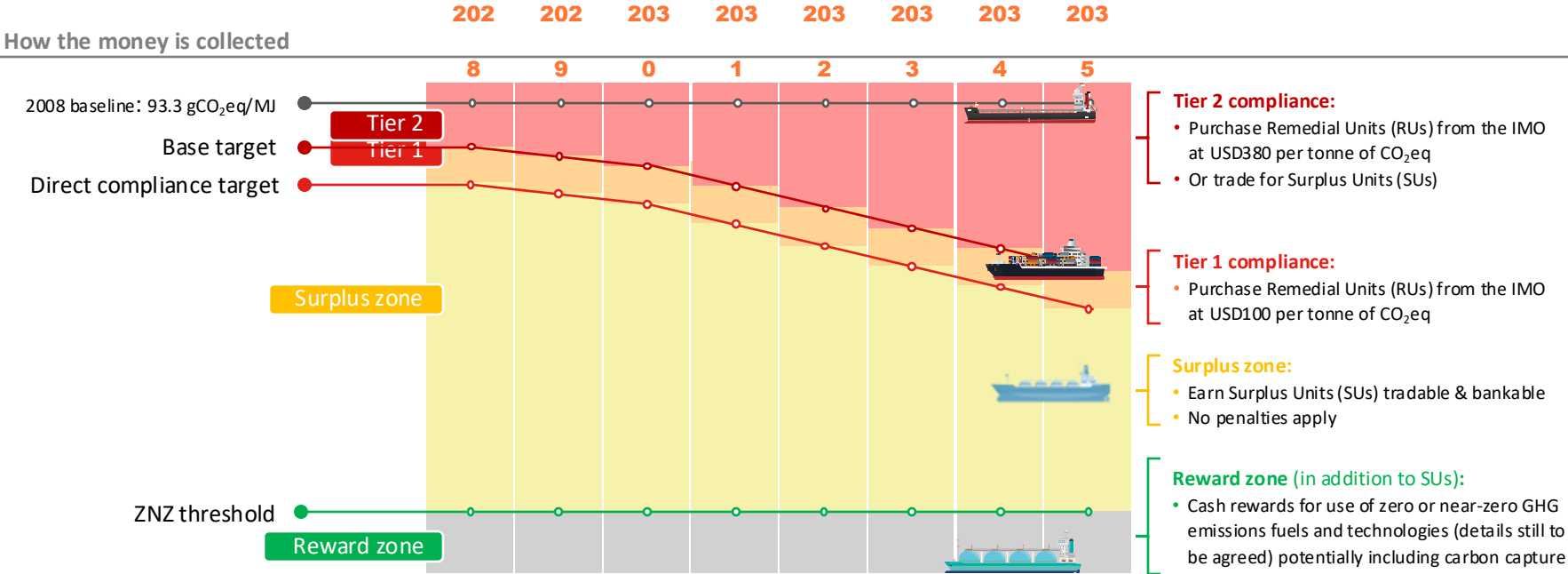
IMO vs EU GHG REGULATIONS

IN SUMMARY

IMO Maritime Environment Protection Committee 83 in April 2025 agreed on three key issues:

- | | | |
|---------------------------|---|-------------------------------|
| 1. Review of the CII | → | CII is put on the back-burner |
| 2. The Global Fuel Levy | → | Discontinued |
| 3. The Net-Zero-Framework | → | Agreed after a vote |

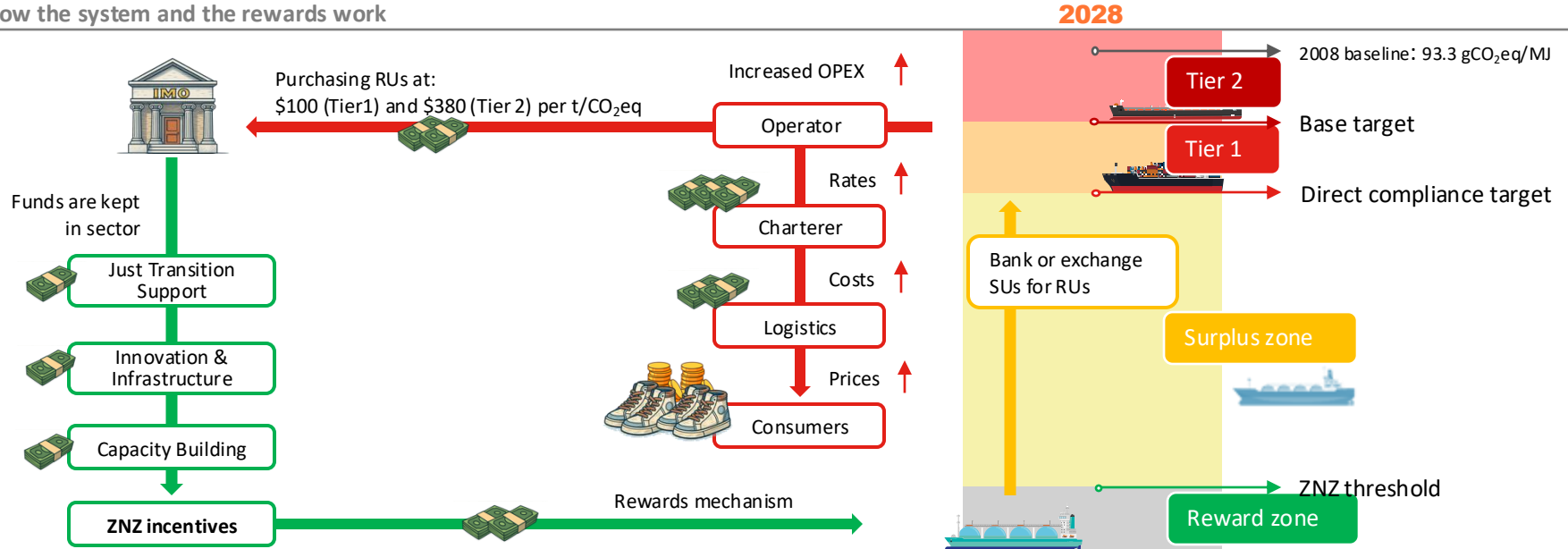
This is how the IMO NZF work in practice



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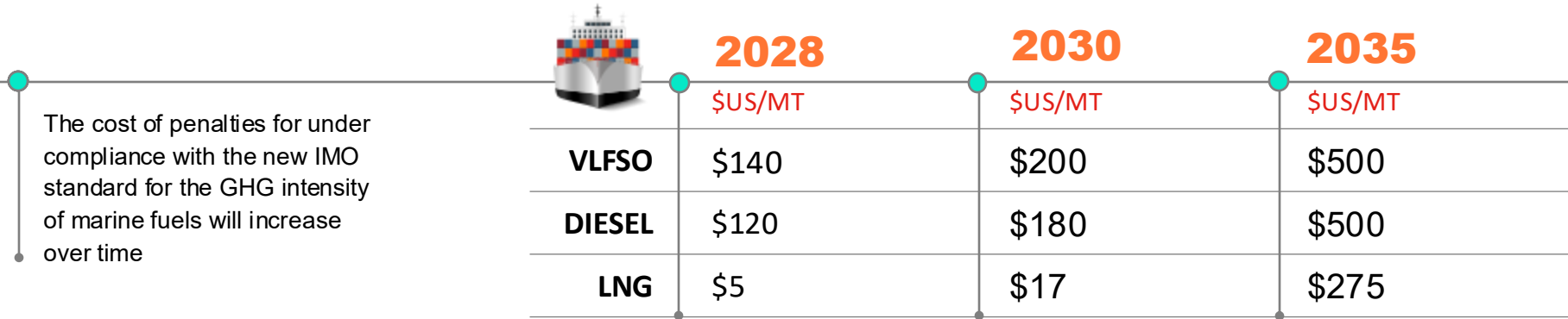
A global reward system that supports direct **OPEX** (& potentially **CAPEX**),
a trade-off between short-term operating pain and long-term strategic investment.

How the system and the rewards work



This is how the IMO NZF work in practice

Estimates of the *approximate* costs of compliance **per tonne of fuel oil** (consumed by ships which continue to use conventional marine fuel) will increase.



The cost of penalties for under-compliance with the new IMO standard for the GHG intensity of marine fuels will increase over time

	2028	2030	2035
	\$US/MT	\$US/MT	\$US/MT
VLFSO	\$140	\$200	\$500
DIESEL	\$120	\$180	\$500
LNG	\$5	\$17	\$275

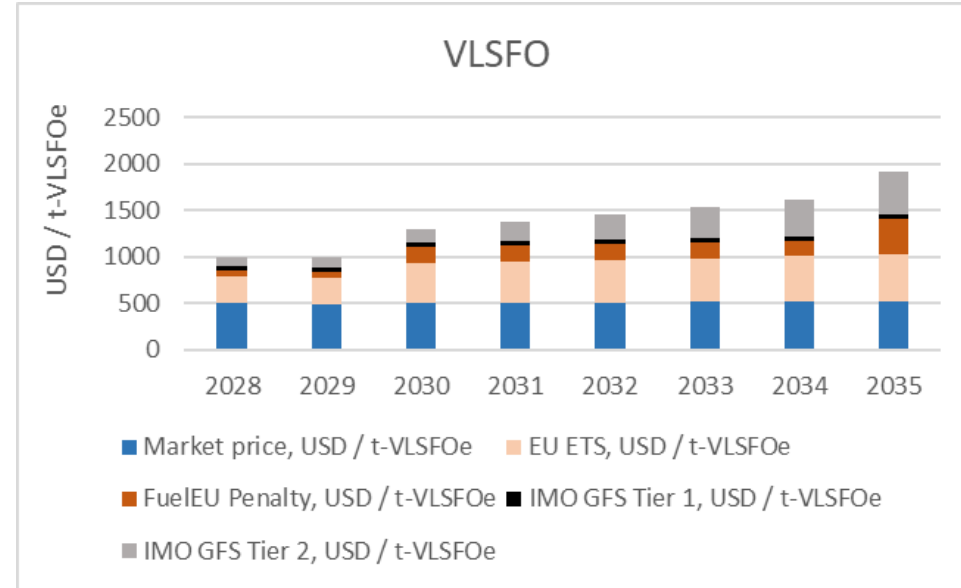
NB: These are estimates only

The NZF provides certainty

- The price for under-compliance with the new GHG Fuel standard has at least been fixed until 2030.
- The costs of compliance for **conventional** fuel types can be readily calculated with **certainty** by shipowners, so that these costs can be passed down the supply chain.
- **Although not the simple flat rate GHG levy which ICS had advocated, this is not a global emissions trading system, to which most of the industry is firmly opposed.**

We cannot accept double counting

The two systems would double the fuel cost for EU trade already in 2028 and triple in 2033



MEPC Extraordinary Session 2

The NZF agreement at MEPC83 could only be reached after a vote:

Yes	63
No	16
Abstained	24

For formal adoption at the extraordinary session of MEPC 14-17 October, a two-thirds majority is required (72 affirmative votes).

Dissenting voices are being raised...

US threatens tariffs and port levies to sink IMO green deal



Sam Chambers · September 4, 2025

8 16,706 3 minutes read



ABS boss urges 'timeout' on IMO climate push



Sam Chambers · September 16, 2025

2,025 4 minutes read



Knut Østbeck-Nilsen (DNV): "I have a major concern with respect to NZF: why put roadblocks on LNG?" (source: DNV)

DNV calls for pragmatism in IMO's net-zero framework emissions policy

18 Sep 2025 by Jamey Bergman



IMO vs EU GHG REGULATIONS

...aren't the IMO regulations very similar to EU Regional rules?...

IMO vs EU GHG regulations

Instrument	Purpose	Application
IMO GFI	Gradually lower the carbon content in energy used on-board	>5,000 GT. International (and possibly national) voyages.
IMO GHG Pricing	Incentivize lower GHG emissions while collecting funds for mitigation	>5,000 GT. International (and possibly national) voyages.
Instrument	Purpose	Application
FuelEU Maritime	Gradually lower the carbon content in energy used on-board	>5,000 GT (>400 GT fr.2027?). Voyages to/from EU Ports
EU ETS	Incentivize lower GHG emissions while collecting funds for mitigation	>5,000 GT (>400 GT fr.2027?). Voyages to/from EU Ports

A man wearing a black cowboy hat and a dark jacket is pointing his right index finger upwards. He has a serious, somewhat stern expression. The background is a plain, light-colored wall.

**I'M NOT PAYING FOR THIS SHIT
TWICE.**

DOUBLE REGULATION?

Operators on EU ports (and soon also UK) are very concerned over having to pay several times for the same emissions.

Fundamentally, undermining ferry services competitiveness in relation to road / rail / aviation is unacceptable.

INTERFERRY requests that the EU discontinues or adapts its regional rules. Operators cannot afford to pay twice.



Ferry Owners Face 'Double Taxation' from EU, Interferry Warns

July 29, 2025




Copyright aerial-drone/AdobeStock



Interferry called on the European Commission to immediately harmonize its unilateral **EU ETS / FuelEU Maritime**

regulations with the recently agreed **IMO Net-Zero Framework**,

A man in a dark tuxedo and bow tie sits behind a dark, curved table. On the table are a bottle, a glass, a microphone, and a hat. The background is a dark, textured wall.

**AND NOW FOR SOMETHING
COMPLETELY DIFFERENT.**

High Speed Craft → Light Craft

- Denmark has decided light craft for domestic crossings (< 5 nm) do not need not meet the speed requisite in the HSC Code.
- We are awaiting approval by the EU for this new “Light Craft Code”.
- Thereafter expanded to longer domestic crossings (<20 nm)...
- ...and eventually be submitted to the IMO by the EU + Interferry for international.



Carriage of electric vehicles

INTERFERRY Position:

- Battery Electric Vehicles (BEV) pose a different, but not higher risk, than Internal Combustion Engine Vehicles (ICEV).
- Ro-Ro and Ro-Pax have high-capacity drencher systems, which are capable of containing also a runaway li-ion battery fire.



In 2022, the US were concerned with PCTCs ...it took us three years to get off the hook

“980 This Special Provision is not applicable to vehicles driven on board under their own power by a passenger, when carried on ro-ro passenger ships as defined in SOLAS regulation II-2/3.42.

The consignee shall assess the safety condition of the vehicle prior to offering for transport.

A vehicle shall not be offered for transport if it is forbidden in accordance with 1.1.3.1 or if it:

- .1 has, or shows signs of leakage from the battery, engine, fuel cell, compressed gas cylinder or accumulator, fuel system, or braking system, when applicable; or
- .2 has, or shows signs of, damage to electric equipment (including but not limited to frayed or damaged cables); or
- .3 has or shows signs of, damage to supplemental restraint systems (SRS) (e.g. airbags, seat belt tensioners); or
- .4 has been impacted by extreme events (e.g. flood, hurricane, tsunami, fire, submersion)

Outcome of 43rd session of IMO EDITORIAL AND TECHNICAL GROUP OF THE SUB-COMMITTEE ON CARRIAGE OF CARGOES AND CONTAINERS

EES & ETIAS

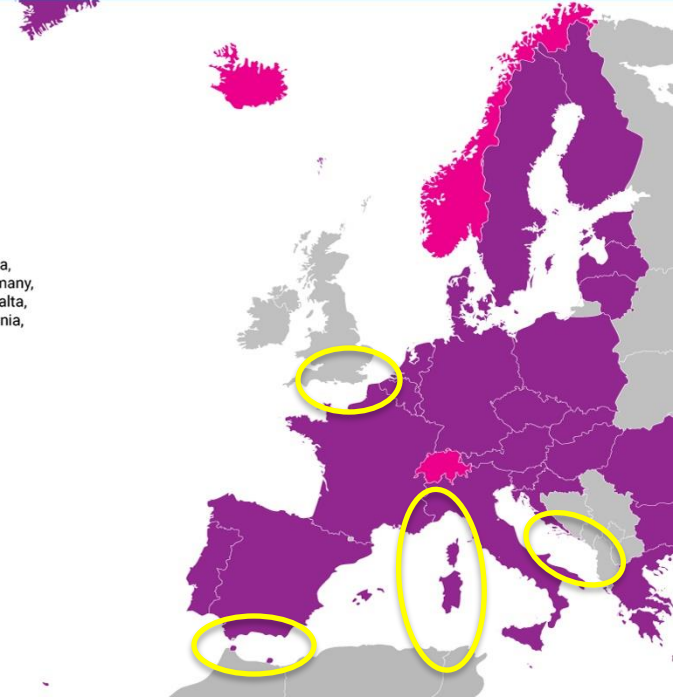
EES

- EU Entry/Exit System will (finally) be introduced on 12 October 2025
- While there are still concerns on practical applications, we have pushed req's from 100% biometric checks from Day 1, to 'at least 10% checks' from Day 1.
- On 10 April 2026, ETIAS follows suit (cf. US ESTA).

EES USERS

29 countries

- **European Union Countries**
25 EU Member States: Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden
- **Schengen Area Associated Countries**
Switzerland, Iceland, Liechtenstein, Norway





Regulatory Affairs