

Summary of Pending IMO Legislation Affecting the Leisure Boating and Large Yacht Industries as at December 2025

Table 1 provides a summary of the principal legislation originating from IMO that will have or will likely have an impact on the leisure boating and yachting industries.

The table provides the title of the regulation, the IMO Committee and/or Sub-Committee that is responsible for it, a brief description and assessment of the likely impact on the industry, details on the pros and cons on each of the rules, any suggested or actual actions being undertaken by ICOMIA and lastly, the entry into force date. The table is ordered by the relevant committee responsible for the regulation.

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The abbreviations for the various IMO Committees used in the table are as follows:

Current Committees and Sub-Committees:

MSC: Maritime Safety Committee

MEPC: Marine Environment Protection Committee

HTW: Sub-Committee on Human Element, Training and Watchkeeping

PPR: Sub-Committee on Pollution Prevention and Response

SDC: Sub-Committee on Ship Design and Construction

SSE: Sub-Committee on Ship Systems and Equipment

NCSR: Sub-Committee on Navigation Communications and Search and Rescue

CCC: Sub-Committee on Carriage of Cargoes and Containers

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Comprehensive review of the STCW Convention and Code</i>	HTW	MSC	A new output to adapt the STCW Convention and Code to new technical developments in shipping, environmental protection, and climate change, with priority to be given to addressing the problems of sexual assault, harassment, and bullying	<u>Pros</u> <ul style="list-style-type: none"> a) Better alignment between current technology and the Convention and Code b) Will provide better protection for seafarers <u>Cons</u> <ul style="list-style-type: none"> a) Possible greater training burden 	Maintain watch on discussions at IMO	Review completed in 2025. Predicted entry into force 1 July 2031
<i>Amendments to the STCW Code – Prevention and response to violence and harassment, including sexual harassment, bullying and sexual assault</i>	HTW	MSC	All seafarers will be required to undertake training on the Prevention and response to violence and harassment, including sexual harassment, bullying and sexual assault.	<u>Pros</u> <ul style="list-style-type: none"> a) Will provide better workplace safeguards for seafarers <u>Cons</u> <ul style="list-style-type: none"> a) Additional training and certification burden 	None required	01/01/26
<i>Application of the Polar Code to non-SOLAS</i>	SDC	MSC	Voluntary guidelines are being developed to apply aspects of the Polar Code to:	<u>Pros</u> <ul style="list-style-type: none"> a) Improved safety standards for crew and 	ICOMIA was an active member of the correspondence	Non-mandatory – guidelines only

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>vessels</i>			fishing vessels and pleasure yachts above 300 GT and below 500 GT engaged in trade.	<p>vessel</p> <p><u>Cons</u></p> <p>a) None foreseen</p>	group and will contribute to discussions at SDC as necessary	
<i>Application of chapters 9 and 11 of the Polar Code to non-SOLAS ships</i>	NCSR	MSC	Chapters 9 (Safety of Navigation) and 11 (voyage Planning) of the Polar Code mandatory for non-SOLAS vessels. Low impact but may require additional equipment to be fitted	<p><u>Pros</u></p> <p>a) Enhanced safety for vessels operating in Polar waters</p> <p><u>Cons</u></p> <p>a) Possible additional equipment required e.g. echo sounder, clear-view bridge windows, additional magnetic compass</p>	ICOMIA participated in the correspondence and working groups	01/01/26
<i>Intact Stability Code 2008 – Second Generation Stability Criteria</i>	SDC	MSC	<p>Additional stability criteria are being introduced into the updated code as follows:</p> <ul style="list-style-type: none"> Pure loss of stability due to reduced righting levers Parametric 	<p><u>Pros</u></p> <p>a) Enhanced stability and safety standards.</p> <p><u>Cons</u></p> <p>a) Possible adverse effect on existing yacht designs.</p> <p>b) Possible additional building costs to meet</p>	None required	<p>MSC.1/Circ.1628 Interim Guidelines for the second generation intact stability Criteria approved at MSC 102</p> <p>Final entry into force date to be</p>

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
			rolling <ul style="list-style-type: none"> • Dead ship conditions • Surf-riding/broaching • Excessive accelerations resulting from “excessive stability” Certain yacht designs may not fully comply with these additional criteria.	new standards.		confirmed.

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Safe Mooring Operations</i>	SDC with input from SSE and HTW	MSC	<p>To amend SOLAS regulation II-1/3-8 (Towing and mooring equipment) and associated guidelines (MSC.1/Circ.1175), as appropriate, for preventing unsafe and unhealthy work situations during mooring operations on new ships through innovative design features and more appropriate equipment. This new regulation would apply to vessels over 3000GT and vessels under this tonnage will be encouraged to comply as far as possible.</p> <p>This regulation could have a significant effect on the design and mooring equipment of yachts over this tonnage threshold.</p> <p>All vessels are to have maintenance and</p>	<p><u>Pros</u></p> <p>a) Enhanced safety standards</p> <p><u>Cons</u></p> <p>a) Design and cost implications</p> <p>b) Additional administrative burden of required maintenance and inspection routines for mooring and towing equipment</p>	None required	<p>Will apply to new vessels over 3000GT built on or after 01/01/24, except that the regulation on the provision of suitable arrangements, equipment and fittings apply to ships constructed on or after 1 January 2007. The section that deals with design of ships apply to ships contracted for construction from 1 January 2024 and ships due for delivery on or after 1 January 2027 (see MSC 102 report).</p> <p>The maintenance and inspection procedures will be confirmed on board at the time of:</p>

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
			inspection procedures for mooring and towing equipment			<ul style="list-style-type: none"> Initial surveys completed on or after 1 January 2024 for new ships First safety construction or safety equipment survey on or after 1 January 2024 for existing ships Passenger ship renewal survey on or after 1 January 2024 for existing ships

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Draft revision of SOLAS chapters II-1 (part C) and V on steering and propulsion requirements</i>	SDC	MSC	Modern steering systems, which often combine propulsion and steering e.g. azipods, are not adequately addressed by current SOLAS regulations. While unified interpretations (MSC.1/Circ.1416/Rev.1) have been used, a comprehensive review is needed to update the IMO's regulatory framework. This work is expected to be completed by 2028, following a high-level roadmap. The amendments are expected to provide regulatory clarity for designers and builders instead of the existing unified interpretations of the current regulations.	<u>Pros</u> a) Provides clarity for designers and builders <u>Cons</u> a) May have cost implications for new builds	Maintain watch on discussions at IMO	Expected to be 1 January 2032. Applicable to all new passenger vessels and to all vessels over 500 GT
<i>Guidelines for use of fibre-reinforced</i>	SDC	MSC	A revision of the Interim FRP Guidelines is being conducted. The scope is limited to fire safety	<u>Pros</u> a) May provide greater	Maintain watch on discussions at IMO. Support the addition of a new	Expected to be concluded in 2026

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>plastics (FRP) within ship structures</i>			aspects under SOLAS Regulation II-2/17 and does not extend to elements contributing to global strength. Load-bearing elements may be considered provided that they did not contribute to global strength. For global strength to be considered, a new output would be required	<p>flexibility for designers and builders</p> <p><u>Cons</u></p> <p>a) May not be comprehensive enough to add increased optionality in design and construction</p>	output to allow global strength to be included in the guidelines	
<i>Experience building phase (EBP) for the reduction of underwater radiated noise from shipping</i>	SDC	MEPC	<p>The outcomes of the EBP are expected to be reviewed at MEPC 85 (2026) at which point the IMO will decide what further actions may be required. In the meantime, the Sub-Committee established a correspondence group with the following main objectives:</p> <ul style="list-style-type: none"> • Develop a framework to assess the progress made on the application and uptake of the revised guidelines. 	<p><u>Pros</u></p> <p>a) Provides environmental benefits</p> <p><u>Cons</u></p> <p>a) None envisioned</p>	Maintain watch on discussions at IMO	Guidelines only, at present

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
			<ul style="list-style-type: none"> • Review technical objectives of the action plan and development of next steps. • Select studies, discuss knowledge gaps and integrate results in the EBP. 			

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Lifting appliances and winches</i>	SSE	MSC	Regulations will apply to vessels over 500 GT (inc. yachts) and to lifting appliances with a safe working load of 1000 KG and over	<u>Pros</u> a) Improved safety standards <u>Cons</u> a) No significant disadvantages foreseen	None required	01/01/26
<i>Single fall and hook systems with on-load release capability – Amendments to the LSA Code</i>	SSE	MSC	Enhanced safety requirements for launching appliances for lifeboats and rescue boats. Will apply to new installations with a single fall and hook system on vessels over 500 GT. Low impact on industry	<u>Pros</u> a) Improved safety standards <u>Cons</u> a) No significant disadvantages foreseen	None required	Applicable to new ships built on or after 01/01/26
<i>Prohibition of perfluorooctane sulfonic acid (PFOS) for fire-fighting on board ships</i>	SSE	MSC	Regulations will apply to vessels over 500 GT (inc. yachts) and include a ban on PFOS in fixed and portable foam fire-fighting systems. Low impact on industry	<u>Pros</u> a) Improved environmental standards <u>Cons</u> a) No significant disadvantages foreseen	None required	Applicable to new and existing ships not later than the first annual, periodical or renewal survey after the entry into force date, which is expected to be 01/01/26
<i>Comprehensive review of the requirements</i>	SSE	MSC	Much needed review of the resolution with respect to who is authorised to conduct	<u>Pros</u> a) Will clarify the requirements for	Maintain watch on discussions at IMO	Expected 01/01/32

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear (resolution MSC.402(96))</i>			<p>testing, overhaul and repair of life-saving appliances falling under the resolution. The main point at issue concerns the terms “make” and “type” as they apply to the certification of service technicians, which have been inconsistently interpreted by key stakeholders.</p> <p>Will have a beneficial impact.</p>	<p>authorising who is qualified to conduct testing, overhaul and repair of LSA</p> <p><u>Cons</u></p> <p>a) Confusion will persist until the amendments enter into force</p>		
<i>Amendments to SOLAS Chapter III and Chapter IV of the LSA Code to require the carriage of self-righting or canopied reversible liferafts for new ships</i>	SSE	MSC	All passenger and cargo ships will need to carry automatically self-righting or canopied reversible liferafts (except for liferafts with a capacity of less than 12 persons).	<p><u>Pros</u></p> <p>a) Improved safety</p> <p><u>Cons</u></p> <p>a) Additional cost of compliance</p>	Maintain watch on discussions at IMO	Predicted to be 1 January 2032

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Computerised Stability support for the master in case of flooding in passenger ships</i>	SDC	MSC	A requirement for an on-board stability computer or shore-based support to assist masters in assessing damage implications. Will apply to passenger ships (inc. passenger yachts) over 120m in length. This is a low-impact regulation that will improve safety.	<u>Pros</u> a) Improved safety <u>Cons</u> a) Relatively minor additional cost.	None required	01/01/20. Passenger ships constructed before 1 January 2014 must comply not later than the first renewal survey after 5 years after the entry into force date.
<i>Fuel oil safety</i>		MSC	A requirement that ships be provided with a signed declaration by the fuel supplier's representative that the fuel is in conformity with SOLAS II.2/4.2.1 i.e. that the flashpoint has been measured and is at or above 70°C. Minimal impact on the industry	<u>Pros</u> a) Improved safety standards for vessel <u>Cons</u> a) None foreseen	None required	01/01/26

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Evaluation of adequacy of fire protection, detection and extinction arrangements in vehicle, special category and ro-ro spaces in order to reduce the fire risk of ships carrying new energy vehicles</i>	SSE	MSC	<p>A new output to address the risk of the carriage and charging of lithium-ion batteries</p> <p>Due to the lack of regulation on the carriage of Li-ion batteries this new output is likely to be a positive development</p>	<p><u>Pros</u></p> <ul style="list-style-type: none"> a) Improved safety standards b) Clear direction on safety procedures to be followed <p><u>Cons</u></p> <ul style="list-style-type: none"> a) Potential for regulations to be overly restrictive/impractical 	Maintain watch on discussions at IMO	01/01/28 provided that the SOLAS amendments are adopted before 01/07/26
<i>Revision of SOLAS regulation V/23 and associated instruments to improve the safety of pilot transfer arrangements</i>	NCSR	MSC	Amendments to SOLAS regulation V/23 to make the performance standards for pilot transfer arrangements mandatory. These contain detailed requirements for design, manufacture, construction, inspection, maintenance, replacement, rigging and crew training.	<p><u>Pros</u></p> <ul style="list-style-type: none"> a) Will improve safety for pilots <p><u>Cons</u></p> <ul style="list-style-type: none"> a) May require costly modification of existing pilot transfer arrangements b) Additional maintenance/administr 	None required	01/01/28

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
				ative burden		

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Development of measures to ensure the safe operation of elevators on board ships</i>	SSE	MSC	<p>A new output to address the safe operation of elevators and development of non-mandatory guidelines for the design, installation, maintenance, inspection and operation of elevators</p> <p>Likely to be a low impact output</p>	<p><u>Pros</u></p> <p>a) Will improve standards of safety and reduce the possibility of injury to personnel working in elevator shafts</p> <p><u>Cons</u></p> <p>a) None foreseen</p>	Maintain watch on discussions at IMO	01/01/32 provided that the amendments are adopted before 01/07/30
<i>Draft Amendments to SOLAS IV & V and performance standards and guidelines to introduce VHF Data Exchange System (VDES)</i>	NCSR	MSC	<p>VDES is a new communication system under the GMDSS that builds on the existing AIS allowing enhanced data rates through the system. The system will operate between ships, shore stations and satellites. It will apply to ships over 300 GT. This is a low-impact output</p>	<p><u>Pros</u></p> <p>a) Will provide enhanced data exchange capabilities</p> <p><u>Cons</u></p> <p>a) Possible cost implications if new equipment becomes mandatory</p>	Maintain watch on discussions at IMO	Predicted to be 01/01/28
<i>Amendments to SOLAS V/31 and V/32 and to Protocol I of</i>		MSC	<p>The Master of every ship that observes freight containers drifting at sea, shall communicate the particulars of such an</p>	<p><u>Pros</u></p> <p>a) Will enhance safety at sea</p> <p><u>Cons</u></p>	None	01/01/2026

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>MARPOL Article V - Reporting on the loss of containers</i>			observation to any ships in the vicinity and to the nearest coastal state.	a) None foreseen		
<i>MARPOL Annex IV Amendments</i>	PPR	MEPC	<p>A requirement for a sewage management plan, a sewage record book and for annual surveys of sewage treatment plants to confirm the lifetime performance of the unit.</p> <p>Low impact on industry</p>	<p><u>Pros</u></p> <p>a) Will ensure that STPs operate according to specification throughout certification period.</p> <p><u>Cons</u></p> <p>a) Small additional administrative burden</p>	None required	Predicted entry into force 1 June 2031
<i>Development of a safety regulatory framework to support the reduction of GHG emissions from ships using new technologies and alternative fuels</i>	CCC, SSE, SDC	MSC	IMO has completed a scoping exercise of the risks of fuels and technologies under consideration by the maritime industry.	<p><u>Pros</u></p> <p>a) Will provide regulatory clarity for new fuels and technologies</p> <p><u>Cons</u></p> <p>a) None foreseen at present</p>	Maintain watch on discussion at IMO	To be decided

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Cyber risk management and maritime security</i>		MSC	<p>IMO is developing a non-mandatory Cybersecurity Code which, once adopted, would be followed by an experience-building phase. A decision would then be made on whether the code should be mandatory. It was agreed that:</p> <ul style="list-style-type: none"> • The code should be goal-based • The code should utilise a risk-management approach • The code should not be prescriptive in nature 	<p><u>Pros</u></p> <p>a) Will provide a pragmatic tool for managing cyber risks</p> <p><u>Cons</u></p> <p>a) Could potentially be burdensome for the industry</p> <p>b) Might not adequately address needs of the superyacht sector</p>	Maintain watch on discussions at IMO and intervene as necessary	Non-mandatory at present but could become mandatory in the future via a SOLAS amendment
<i>MARPOL Annex VI Amendments – fuel sampling points</i>	PPR	MEPC	The installation of sampling points for in-use fuel oil for all vessels over 400GT. This will be a low-impact regulation, however, class approval may be needed for the installation.	<p><u>Pros</u></p> <p>b) Will permit simple means of verification that in-use fuel is of the correct specification</p> <p><u>Cons</u></p> <p>a) May require modifications to existing pipework and may require class</p>	None required	<p>New ships (keel laid on or after 1 April 2022): on delivery</p> <p>Existing ships (keel laid before 1 April 2022): no later than the first IAPP renewal survey on or after 1 April 2023</p>

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
				approval		

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>Draft Amendments to MARPOL Annex VI and the NOx Technical Code on the use of multiple engine profiles for a marine diesel engine</i>	PPR	MEPC	MEPC 82 approved amendments to the NOx Technical code concerning the use of multiple engine profiles for a marine diesel engine with a power output of more than 130kW. These amendments control the use of auxiliary control devices for new and existing engines (which undergo significant modification). They are intended to address the use of “defeat devices” and also facilitate the certification of engines that are capable of operating in multiple profiles.	<u>Pros</u> a) Enhanced certification options <u>Cons</u> a) Re-certification of existing engines undergoing modification may prove challenging	None required	01/03/27
<i>Draft Amendments to the NOx Technical Code with regard to re-certification procedures of</i>	PPR	MEPC	New procedures to set out how re-certification of previously installed engines undergoing substantial modification can be achieved. Will apply to marine diesel engines with a power output of more than	<u>Pros</u> a) Will provide clarity on re-certification procedures <u>Cons</u> a) Procedures may be	None required	01/09/2026

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>existing engines</i>			130 kW.	complicated/burden some to implement		
<i>Draft Mid-Term GHG Reduction Measures</i>		MEPC	Development of measures to address reduction of emissions beyond 2027 consisting of a goal-based fuel standard and an economic pricing mechanism on GHG emissions. Details of both components are still under development but the reduction goals of the fuel standard are likely to be a reduction of the GHG fuel intensity of 20% by 2030, 70% by 2040 and 100% by 2050 in comparison to 2008 levels will apply to vessels over 5000 GT and possibly, at a future date, ships over 400 GT. This is a potentially high impact regulation on the yachting sector	<u>Pros</u> <ul style="list-style-type: none"> a) Will benefit the environment b) Will enable the yachting industry to contribute to the reduction of GHG emissions c) Will encourage the development of zero-emission ships and/or fuels <u>Cons</u> <ul style="list-style-type: none"> a) Significant cost implications b) Targets may be difficult to achieve 	Maintain watch on discussions at IMO and be prepared to intervene as necessary	Predicted to be 01/03/28, however, this depends on the adoption of the amendments at a reconvened extraordinary session of the MEPC in late 2026.
<i>Amendments to Annex 1 of the Anti-fouling</i>	PPR	MEPC	The use of Cybutryne in anti-fouling paint is to be prohibited.	<u>Pros</u> <ul style="list-style-type: none"> a) Will benefit the marine environment 	ICOMIA is liaising with IPPIC in order to explore how industry interests	01/01/23 – no new applications containing Cybutryne.

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<i>Convention</i>				<u>Cons</u> <ul style="list-style-type: none"> a) Will have cost implications for large yachts b) No sealer coat currently available so will be difficult to comply 	can best be represented.	Cybutryne to be removed from hull or barrier coat applied by first dry-docking on or after 01/01/23 but not later than 60 months following the last application
<i>Amendments to MARPOL Annex VI establishing the Canadian Arctic Emission Control Area (ECA) for nitrogen oxides, sulphur oxides and particulate matter</i>		MEPC	<p>Ships with marine diesel engines over 130kW operating in this ECA will need to install a Nox Tier III engine. In addition, the sulphur limit of fuel used onboard must not exceed 0.10%_{m/m}</p> <p>This is a low impact regulation as Tier III and low-sulphur fuels are already mandated in other areas and the Canadian Arctic is rarely visited by the leisure boat and yachting sector</p>	<u>Pros</u> <ul style="list-style-type: none"> a) Will be of benefit to the marine environment <u>Cons</u> <ul style="list-style-type: none"> a) None foreseen 	None required	01/03/26
<i>Amendments to MARPOL Annex VI establishing</i>		MEPC	Ships with marine diesel engines over 130kW operating in this ECA will need to install a Nox	<u>Pros</u> <ul style="list-style-type: none"> a) Will be of benefit to the marine environment 	None required	01/03/26

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
<i>the Norwegian Sea Emission Control Area (ECA) for nitrogen oxides, sulphur oxides and particulate matter</i>			<p>Tier III engine. In addition, the sulphur limit of fuel used onboard must not exceed 0.10%_{m/m}</p> <p>This is a low impact regulation as Tier III and low-sulphur fuels are already mandated in other areas.</p>	<p><u>Cons</u></p> <p>a) None foreseen</p>		
<i>ECAs for SO_x and NO_x in the North-East Atlantic Ocean</i>		MEPC	<p>ECA for NO_x and SO_x in the North-East Atlantic, covering Greenland, Iceland, the Faroe Islands, the west coast of the UK and Ireland, and extending south to Spain and Portugal. Ships with marine diesel engines over 130kW operating in this ECA will need to install a Nox Tier III engine. In addition, the sulphur limit of fuel used onboard must not exceed 0.10%_{m/m}</p> <p>This is a low impact regulation as Tier III and low-sulphur fuels are</p>	<p><u>Pros</u></p> <p>b) Will be of benefit to the marine environment</p> <p><u>Cons</u></p> <p>a) None foreseen</p>	None required	Predicted entry into force 01/09/27

Legislation	Sub-Committee	Committee	Description and likely impact	Pros and Cons	ICOMIA actions	Entry into force
			already mandated in other areas.			