

Information for State Authorities, Ship Owners, Masters, Fuel Suppliers, Agents or Operators of Ships operating in the Mediterranean Sea











New Sulphur Limits

- As from 1 May 2025, ships operating within the Med SO_X ECA must use fuel oil with a maximum sulphur content not exceeding 0.10% m/m
- Bunker suppliers must provide compliant fuel and shipowners must ensure fuel quality documentation is readily available (Bunker Delivery Notes (BDN) and fuel sample analysis)



Abatement Methods

As an alternative to using compliant marine fuels, ships may use emission abatement methods:

Exhaust Gas Cleaning Systems (EGCS) or **scrubbers** should comply with the relevant IMO quidelines.

Alternative fuels such as LNG, Biofuels or other Low Sulphur fuels

Approved Emission Abatement Methods must be capable of continuously achieving reductions of sulphur emissions (SOx) equivalent to those using compliant fuels and have to be approved prior to their use. However, certain ports may impose restrictions on the use of scrubbers.

How It Will Be Enforced

Mediterranean competent port authorities are responsible for the enforcement of these requirements on all vessels flying their flag and all vessels of all flags while in their ports. In particular, the authorities will carry out inspections, sampling and analysis of the marine fuels used on board.

Inspections will involve documentary verifications, and, as appropriate:

- sampling of the marine fuel for on-board combustion while being delivered to ships, or
- sampling and analysis of the sulphur content of marine fuel for on-board combustion contained in tanks, where technically and economically feasible, and in sealed bunker samples on board ships.

Documentation on Board

As means of sampling, analysis and inspection, the competent port authorities will, as a minimum, verify the on-board bunker delivery notes, and, as appropriate:

- ships' logbooks, or
- abatement method documents, if appropriate.

In addition, other on-board documentation may be considered by the inspectors to ascertain compliance. Also, ships found not to be in compliance with the required standards for marine fuels, might be requested to provide additional evidence including:

- actions taken to achieve compliance, and
- attempts to purchase compliant marine fuel.

Enforcement Information System

The THETIS-MED system has been developed by EMSA and is a clone of the current system used by the EU Member States and the non-EU Parties to the Paris MoU, commonly known as THETIS which is already hosted in and managed by EMSA. However, THETIS-Med is fully customised and built to respond to the requirements, rules and procedures of the Med MoU, as the information system for recording and sharing the findings of enforcement actions to verify compliance during port State control inspections.

For those Mediterranean coastal States that are also members of the European Union and/or the Paris MoU, the THETIS-S and THETIS Information Systems will be used.

What Can I Do To Prepare?

Operators should ensure that appropriate procedures are established on board and that the crew is familiar with them. Attention should be paid to the correct completion of ship logbooks, including the time when fuel changeover operations are performed. Ships using separate fuel oils to comply with the sulphur requirements, should carry a written procedure showing how the fuel oil changeover is to be achieved while entering or leaving the Med SOx ECA. The procedure should allow sufficient time for the fuel oil service system to be fully flushed of all fuel oils exceeding the new applicable sulphur content, prior to entry into a Med SOx ECA, in order to avoid any contamination.

In addition, the volume of low sulphur fuel oils in each tank, as well as the date, time, and position of the ship when any fuel oil changeover operation has been completed prior to the entry into the Med SOx ECA or commenced after exit from such an area, should be recorded in the logbook.

Also, ships provided with an Oil Record Book Part I (Machinery Space Operations) must pay attention to the recording of bunkering of fuel operations.

Actions for Shipowners & Operators

- Conduct fuel supply agreements with compliant fuel suppliers well in advance.
- Ensure crew training on fuel changeover procedures and Med Sox ECA regulations.
- Update the Ship Energy Efficiency Management Plan (SEEMP) to reflect fuel policy changes.
- Perform trials on fuel switching procedures before enforcement to avoid engine or operational issues.
- Verify compliance through periodic fuel testing and onboard audits.

Benefits Of Compliance

Environmental Protection:

Reducing SOx emissions improves air quality and protects marine ecosystems

Regulatory Compliance:

Avoid undue delays and ensure smooth operations with the Med SOx ECA

Industry Reputation:

Demonstrate commitment to sustainable shipping practices.

Penalties

Penalties may be imposed by Contracting Parties for breaches of the national provisions adopted pursuant to MARPOL Annex VI. Non-compliance may lead to detentions, fines or legal actions by coastal States.

Ships must report fuel non-availability through the Fuel Oil Non-Availability Report (FONAR) but repeated reliance on FONAR is not an exemption.

Stay Compliant, Protect the Environment, and ensure Smooth Operations in the Mediterranean!

Useful Links & Further Information

For further guidance, contact your flag State Administration, local maritime authorities or recognised organisation.

Additional useful resources are available on:

Guidance Document on the consistent implementation of the 0.10% sulphur limit under MARPOL Annex VI in the Med SO_X ECA

Med SO_X ECA

Clean air in shipping

IMO 2020