Sjøfartsdirektoratet
Norwegian Maritime Authority

Circular - Series R

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Regulations concerning amendments to the Regulations on environmental safety for ships and mobile offshore units to implement Resolution MEPC.392(82) on the establishment of new Emission Control Areas in the Norwegian Sea and the Canadian Arctic into Norwegian legislation

The Norwegian Maritime Authority (NMA) has laid down amendments to the Regulations of 30 May 2012 No. 488 on environmental safety for ships and mobile offshore units (Environmental Safety Regulations) to implement Resolution MEPC.392(82) into Norwegian legislation.

The resolution concerns the establishment of new Emission Control Areas (ECAs) in the Norwegian Sea and the Canadian Arctic. The amendments provide that, as from 1 March 2026, the Norwegian Sea and the Canadian Arctic shall be designated as Emission Control Areas for nitrogen oxides (NO_x), and sulphur oxides (SO_x). In Norway, an Emission Control Area has already been established in the North Sea, with emission requirements applicable to both NO_x and SO_x. As a result of the new amendments, all Norwegian sea areas will thus be designated as Emission Control Areas for NO_x and SO_x.

The amendments enter into force on 1 March 2026.

Consultation

A proposal for amendments to the Environmental Safety Regulations was circulated for comments during the period from 15 December 2025 to 15 February 2026. The consultation period was somewhat shortened, but was considered to be in compliance with the Instructions for Official Studies and Reports.

The NMA received consultation responses from the Ministry of Justice and Public Security and the Norwegian Union of Marine Engineers, both of which had no comments. In addition, the NMA received comments from the Norwegian Fishermen's Association, Nord Fiskarlag, Kystrederiene (the Coastal Shipowners' Association) and Nordland county municipality.

The Norwegian Fishermen's Association and Nord Fiskarlag are of the view that the consultation document does not sufficiently address the practical and economic consequences of the ECA regime, and they request clearer information regarding the impact and costs. In particular, they call for an overview of the additional cost of fuel with a sulphur content of 0.10% north of latitude 62° N, and how this, in combination with the CO_2 tax and requirements for biofuels, may collectively affect the sector.

The Norwegian Fishermen's Association also requests assessments of the economic consequences for individual vessels, including additional costs related to engines and gas exhaust cleaning systems, as well as consideration of support schemes for vessels with an engine power below 750 kW that fall outside the scope of the NO_x Fund. Furthermore, they seek clear guidance on the exemption scheme applicable in cases of space limitations on smaller vessels, and clear criteria for when exemptions may be granted.

The NMA would first like to point out that the task of preparing a possible application for a new Emission Control Areas was assigned by the Ministry of Climate and Environment in 2021, and that the work on advancing a proposal for a new ECA in the Norwegian Sea was known well in advance of MEPC 81 in 2024. The NMA would further like to emphasise that the establishment of new Emission Control Areas in the Norwegian Sea and the Canadian Arctic has been adopted by the IMO, and that Norway, as a Party to MARPOL Annex VI, is obliged to implement the decision into Norwegian law in accordance with the established time limits for both NO_x and SO_x requirements. Accordingly, the further work is directed towards ensuring a predictable and effective implementation of the regulatory framework, and not towards a reopening of the underlying decision-making basis.

With regard to the organisations' views on the impact assessment, the NMA would like to emphasise that the Instructions for Official Studies lay down requirements for governmental impact assessments. The NMA is of the view that these requirements have been complied with. In connection with Norway's preparation of the application to the IMO to extend the ECA to also cover the Norwegian Sea, a socio-economic analysis was prepared. The analysis constituted the formal decision-making basis and provided a comprehensive and balanced assessment of costs, environmental benefits and health effects. All fleet segments affected by the new regulatory framework were included in the analysis, both small and large vessels, the fishing fleet, short-sea shipping and other commercial vessels. Given the significant diversity of the Norwegian fleet, it would have been highly resource-intensive to assess impacts at the level of individual vessels. The assessment is therefore based on a holistic and fleet-wide approach, which is in line with the Instruction for Official Studies and Reports.

A large part of the fishing fleet already uses distillate fuels or marine gas oil (MGO) that comply with the sulphur requirements, and these vessels will therefore not incur additional costs as a result of the new NO_x and SO_x emission requirements. The NMA notes that the extension of the ECA will mean that the NO_x requirements primarily apply to new ships and to ships with diesel engines undergoing major conversions.

The Norwegian coastal ship owners state that they support the objectives of emission reductions, but express concerns regarding administrative burdens, the risk of duplicate requirements, and the potential consequences for the competitive position of Norwegian shipping.

The NMA would like to point out that the regulations are international in nature and will apply to all ships covered by the new rules, irrespective of flag, when operating in the Economic Zone of Norway and in coastal waters within the baselines. There are no duplicate requirements in this case. On the contrary, the amendments entail a harmonisation of requirements throughout the Economic Zone of Norway and in coastal waters within the baselines.

In order to ensure clear and practical compliance with the NO_x Tier III requirements resulting from the extension of the ECA to also cover the Norwegian Sea, the NMA will publish a guidance circular simultaneously with this adoption circular.

Nordland county municipality states that it supports stricter requirements for the reduction of NO_x and SO_x emissions in the Norwegian Sea, but requests exemptions or adaptations for electric ferries and high-speed craft with diesel engines used as back-up, as well as clearer information regarding economic consequences and the need for government support schemes.

The Norwegian Maritime Authority clarifies that the Regulations cannot provide for general exemptions, and that any such adaptations must be applied for on an individual basis in accordance with the criteria set out in the regulatory framework, with the guidance circular serving as support. With regard to the economic

consequences for the county municipality's fleet, reference is made to the comments above concerning the submissions form the Norwegian Fishermen's Association.

On the adopted amendments

On 4 October 2024, the Marine Environment Protection Committee (MEPC) of the International Maritime Organization adopted Resolution MEPC.392(82), amending MARPOL Annex VI (the International Convention for the Prevention of Pollution from Ships).

The amendments provide that, as from 1 March 2026, the Norwegian Sea and the Canadian Arctic shall be designated as Emission Control Areas for nitrogen oxides (NO_x), and sulphur oxides (SO_x). In Norway, an Emission Control Area has already been established in the North Sea, covering both the Economic Zone of Norway and the coastal waters within the baselines, with emission requirements applicable to both NO_x and SO_x. As a result of the new amendments, the entire Economic Zone of Norway and the coastal waters within the baselines will be designates as Emission Control Areas for NO_x and SO_x.

The NMA would like to draw attention to the fact that the definition of the "Norwegian Sea" in MARPOL regulation II/13.9.4 is broader than the traditional geographical understanding and also encompasses sea areas in the Barents Sea. It is important that the industry is aware of this with regard to the scope of application of the regulatory framework.

The purpose of the amendments is to reduce emissions of NO_x and So_x, as these gases have documented adverse effects on human health, the natural environment and materials. They may cause respiratory problems, contribute to acid rain that damages ecosystems and buildings and lead to the formation of ground-level ozone, which harms vegetation and exacerbates smog formation.

The NO_x Tier III requirements will apply to all ships with diesel engines with an output exceeding 130 kilowatts (kW) and will enter into force on different dates for each Emission Control Area. For the Norwegian Sea, the requirements apply to ships for which building contracts are entered into on or after 1 March 2026. Where no building contract exists, the requirements apply to ships the keel of which is laid on or after 1 September 2026, and the requirements apply irrespective of the date of contract or keel-laying to ships delivered on or after 1 March 2030. For the Canadian Arctic, the requirements apply to ships constructed on or after 1 January 2025.

The NO_x Tier III requirements also apply to ships with diesel engines undergoing major conversions after the relevant dates.

The SO_x requirements apply to all ships operating in the Norwegian Sea and the Canadian Arctic as from 1 March 2027. Fuel oil used on board shall have a sulphur content not exceeding 0.10% m/m, or the ship shall apply an equivalent method approved by the Administration.

MARPOL has been implemented into Norwegian legislation by incorporation into the Regulations of 30 May 2012 No. 488 on environmental safety for ships and mobile offshore units (Environmental Safety Regulations). Where the Convention is amended, the Environmental Safety Regulations must be amended accordingly.

MARPOL Annex VI has been implemented into the Environmental Safety Regulations in section 12. The amendment is therefore incorporated by reference to the relevant Resolution in section 12 of the Environmental Safety Regulations.

Further details on the amendments to MARPOL

The amendments to MARPOL that follow from the mentioned Resolution were negotiated and adopted by the MEPC. Norway prepared its positions for the meeting in cooperation with the industry and participated in the

negotiations. The industry is expected to be familiar with the amendments through information provided by the NMA and the relevant interest organisations.

NO_x Emission Control Areas

The Norwegian Sea and the Canadian Arctic have been designated as NO_x Emission Control Areas in MARPOL regulation VI/13.6.5. And VI/13.6.6. The NO_x Tier III requirements apply to all ships with diesel engines with a power output exceeding 130 kW that fall within the specified dates applicable to each NO_x Emission Control Area. For the Norwegian Sea, the requirements apply to ships for which building contracts are entered into on or after 1 March 2026. Where no building contract exists, the requirements apply to ships the keel of which is laid on or after 1 September 2026, and the requirements apply irrespective of the date of contract or keel-laying to ships delivered on or after 1 March 2030. In the Canadian Arctic, the NO_x Tier III requirements apply to ships constructed on or after 1 January 2025.

Major conversion

The new requirements also apply to a diesel engine undergoing a major conversion1[1] after the relevant date applicable to the individual Emission Control Area. Regulation VI/13.2.2 requires that, where a non-identical engine[2] is installed or an additional engine is installed, the applicable requirement at time[3] of replacement or installation of the engine shall be complied with. For a ship intended to operate in the Norwegian Sea, a diesel engine to be used on board shall therefore comply with the NO_x Tier III requirements in the following cases:

- where the contract date for delivery of the engine to the ship is 1 March 2026 or later;
- where the delivery date of the engine to the ship is 1 March 2026 or later, where no contract date exists;
- irrespective of the contract or delivery date, where the engine is installed on board the ship and undergoes testing on or after 1 September 2026.

SO_x Emission Control Areas

From 1 March 2027, all ships operating in the Norwegian Sea and the Canadian Arctic shall use fuel oil with a sulphur content not exceeding 0.10% m/m. Alternatively, the ship shall be fitted with approved exhaust gas cleaning technology. This constitutes the main rule as set out in MARPOL regulation VI/14.4. The Norwegian Sea and the Canadian Arctic are designated as sulphur oxide emission control areas under regulation VI/14.3.

International Air Pollution Prevention Certificate (IAPP Certificate)

As a consequence of the introduction of emission control areas in the Norwegian Sea, where the contract date, keel laying and delivery date are used as the relevant applicability dates for the entry into force of the NO_x Tier III requirements, the format of the supplement to the IAPP Certificate has also been updated.

[1] A «major conversion» is defined in MARPOL Annex VI, regulation VI/ 13.2.1.
[2] An «identical engine» is defined in interpretation 9, «Identical replacement engines» in circular MEPC.1/Circ.795/Rev.9 3.
[3] The «time of replacement of an engine» is defined in interpretation 10, «Time of replacement of an engine» in circular MEPC.1/Circ.795/Rev.9.

Economic and administrative consequences

Environment

Analyses conducted by the NMA, based on technical input from DNV, the Norwegian Institute for Air Research and Menon Economics, show that the introduction of an emission control area in the Norwegian Sea will result in significant environmental benefits. The calculations indicate that the establishment of an emission control area in the Norwegian Sea may reduce sulphur oxide emissions by approximately 68% by 2030 compared to the 2020 level. Furthermore, emissions of particulate matter may be reduced by 49%. With regard to nitrogen oxides, reductions are expected to occur only after 2030, with an estimated average reduction of 1,500 tonnes per year up to 2050. After 2050, emission reductions are estimated at 16,500 tonnes per year.

The industry

For the industry, the introduction of an emission control area in the Norwegian Sea entails that the requirements for emissions of both NO_x and SO_x are now harmonised across the entire Norwegian exclusive economic zone and in sea areas along the coast within the baselines. This provides predictability for shipowners and operators and reduces complexity, as ships will no longer need to comply with different regulatory regimes in different parts of the Norwegian waters. A uniform regulatory framework therefore facilitates simpler planning of operations, compliance and investments.

The cost associated with the implementation of the SO_x requirements for ships subject to the regulations are estimated at approximately USD 30 million per year. These costs primarily arise from the transition to fuels with a lower sulphur content or from the installation and operation of exhaust gas cleaning technology. The unit cost of reducing SO_x emissions is estimated at USD 10,300 per tonne, which is only marginally higher than the cost of land-based measures set out in the ECA application for the North American emission control area.

The cost of implementing the NO_x requirements is estimated at approximately USD 21.5 million per year, primarily related to the installation and operation of catalytic converters. The unit cost of reducing NO_x emissions is estimated at USD 1,670 per tonne, which is considered to be in line with the costs of Norwegian land-based measures.

In the case of a major conversions following the introduction of the emission control area in the Norwegian Sea from 1 March 2026, such as engine replacement or the installation of an additional engine, costs may increase significantly for vessels operating in the area.

The NMA would like to draw attention to the fact that the definition of the “Norwegian Sea” in MARPOL regulation II/13.9.4 is broader than the traditional geographical understanding and also encompasses sea areas in the Barents Sea. It is important that the industry is aware of this with regard to the scope of application of the regulations.

The administration

For the NMA, the amendments will entail an adjustment of enforcement practices to ensure compliance with the new provisions of the MARPOL Convention. This may include adjustments to inspection procedures, supervisory methods and the follow-up of documentation. Beyond these adjustments, the amendments are considered to have limited administrative consequences.

In connection with the implementation of the new regulations concerning the establishment of an Emission Control Area (ECA) in the Norwegian Sea, the NMA has prepared a new guidance circular. The new circular providing guidance on the NO_x Tier III requirements in the emission control areas of the North Sea and the Norwegian Sea will be published simultaneously with this regulatory circular.

Sjøfartsdirektoratet
Norwegian Maritime Authority

Circular - Series R

Yours faithfully,

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Legislation and International Relations

This document has been electronically approved and therefore does not contain handwritten signatures.