



Technical Circular

No.: 033/2025

Date: 5th December 2025

Subject: New IMO Requirements coming into force in 2026

Enclosed herewith please find the new IMO requirements coming into force in 2026.



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Summary of new IMO requirements coming into force in 2026

Sr. No	Convention/ Regulation	Resolution	New Ship			Existing Ship			Subject Remarks
			Ship type	Size	Compliance date	Ship type	Size	Compliance date	
1	SOLAS II-2 HSC Code 1994/2000	MSC.535(107)	All	All	01.01.2026	All	All	01.01.2026	<p>Prohibition on the use of fire-fighting foams containing perfluorooctane sulfonic acid (PFOS):</p> <ul style="list-style-type: none"> ▪ Amendments to SOLAS chapter II-2, and the 1994 and 2000 HSC Codes to prohibit the use of fire-fighting foams containing perfluorooctane sulfonic acid (PFOS), were adopted. ▪ The prohibition enters into force on 1 January 2026 and applies as follows: <ul style="list-style-type: none"> a. Ships constructed on or after 1 January 2026 shall not use or store fire-extinguishing media (including firefighting foams) containing perfluorooctane sulfonic acid (PFOS) in concentrations above 10 mg/kg (0.001% by weight) upon the ship's delivery. b. Ships constructed before 1 January 2026 shall comply with requirements not later than the date of the first scheduled SEQ Survey (Annual/Periodical/Intermediate/Renewal) on or after 1 January 2026. ▪ The amendment further requires that prohibited substances containing PFOS, when removed from the ship, must be delivered to appropriate shore-based reception facilities. ▪ The maker's declaration or laboratory test reports will be used for verification of the presence of PFOS in fire-extinguishing media. ▪ The declaration issued by the foam maker should contain information about the foam such as, but not limited to: <ul style="list-style-type: none"> a. foam type, b. production period, c. batch No., d. ref. to type approval / MED Certificate for the foam. ▪ For extinguishing media installed before 1 January 2026, where the maker's declaration or laboratory test reports are not available, sampling and testing of the fire-extinguishing media on board will be required to be conducted in accordance with a recognized standard (e.g. NPR-CEN/TS 15968) in order to verify that the firefighting media does not contain PFOS in concentrations above 10 mg/kg (0.001% by weight). ▪ Ship Owners/ managers and Masters to take note of above and accordingly ensure that by the first scheduled SEQ Annual/Periodical/Intermediate/Renewal survey on or after 1 January 2026: <ul style="list-style-type: none"> ✓ Appropriate evidence is available on board providing that fire-extinguishing media does not contain PFOS in concentrations above 10 mg/kg (0.001% by weight) or towards safe disposal of any prohibited fire-extinguishing media.

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									<ul style="list-style-type: none"> ✓ When removed from a ship, ensure PFOS are delivered to appropriate shore-based reception facilities. The removal and subsequent delivery to an appropriate shore-based reception facility are duly recorded in the ship's official logbook. ✓ Ensure the tanks are cleaned and all residues of PFOS are removed. ✓ Replacement extinguishing media is approved and certificated in accordance with the applicable IMO guidelines. The extinguishing media approval certificate clearly indicates the absence of PFOS in the media. <p>For details, refer IRS Technical Circular No. 025/2025, dated 21 August 2025.</p>
2	SOLAS II-1	MSC.532(107)	All	All	01.01.2026	All	All	01.01.2026	<p>Safety requirements on lifting appliances and anchor handling winches:</p> <ul style="list-style-type: none"> ▪ IMO's Maritime Safety Committee at its 107th session vide MSC.532(107)) adopted new SOLAS Regulation II-1/3-13 specifying requirements on lifting appliances, anchor handling winches and associated loose gears. Additionally, "Guidelines for anchor handling winches" (MSC.1/Circ.1662) and "Guidelines for lifting appliances" (MSC.1/Circ.1663) were adopted. ▪ This new regulation comes into force on 1 January 2026 and mandates the design, construction, operation, testing, and maintenance requirements for Lifting Appliances and Anchor Handling Winches with an aim to prioritize safety of personnel, assets and to prevent failures and accidents. <p>Lifting Appliances: Lifting appliances that are installed on or after 1 January 2026 will need to:</p> <ol style="list-style-type: none"> a. Be designed, constructed and installed in accordance with requirements of approved Recognized Organizations. b. Load tested and thoroughly examined after installation and before being taken into use for the first time and after repairs, modifications or alterations. c. Be permanently marked and provided with documentary evidence for the safe working load (SWL). <p>Lifting appliances that are installed before 1 January 2026 will need to:</p> <ol style="list-style-type: none"> a. Be tested and thoroughly examined, based on MSC.1/ Circ. 1663 – Guidelines for Lifting Appliances and be permanently marked and provided with documentary evidence for the SWL no later than the date of the first SAFCON Renewal survey on or after 1 January 2026. <p><i>"Existing lifting appliances with valid certificates of test and thorough examination under another international instrument acceptable to the Administration (e.g. ILO Convention No. 152) and issued prior to 01 January 2026 are considered compliant with the requirement"</i></p> <p>Regardless of installation date, lifting appliance shall be tested, thoroughly examined, inspected, operated, and maintained based on MSC.1/Circ.1663 and class rules, as applicable.</p>

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									<p>Anchor Handling winches installed on or after 1 January 2026 shall be designed, constructed, installed and tested to the satisfaction of the Administration, based on MSC.1/ Circ. 1662 – Guidelines for Anchor handling winches.</p> <p>Anchor Handling winches installed before 1 January 2026 shall be tested and thoroughly examined based on MSC.1/ Circ. 1662 no later than the date of the first SAFCON Renewal survey on or after 1 January 2026.</p> <p>Ship Owners/ Managers and Masters are advised to be guided by above and accordingly plan for compliance with the requirements as per new SOLAS Regulation II-1/3-13.</p> <p>For details, refer IRS Technical Circular No. 026/2025, dated 22 August 2025.</p>
3	SOLAS V	MSC.532(107) MSC.533(107) MSC.534(107)	Container ships & Bulk carriers	3000 GT and above	Ships Constructed on or after 1 January 2026	-	-	-	<p>Amendments to SOLAS chapter V and format of SE Certificate on carriage of electronic inclinometers:</p> <p>Amendments to SOLAS chapter V require carriage of electronic inclinometers on container ships and bulk carriers of 3,000 gross tonnage and upwards. The requirement is applicable for New ships constructed on or after 01 January 2026.</p> <p>An electronic inclinometer, where fitted, should be connected to shipboard VDR in accordance with the performance standards on VDR (resolution MSC.333(90), as amended), such that ship's rolling motion can be reconstructed during playback.</p> <p>In view of this new requirement, format of SEQ Certificate was also amended to add new entry of "Container ship" in Particulars of ship.</p> <p>Revised format of the Cargo Ship Safety Equipment Certificate along with Record of Equipment (FORM E) will be issued to the vessel by the first scheduled periodical survey on or after 1 January 2026.</p> <p>Above is for information.</p>
4	LSA Code 4.6	MSC.535(107) MSC.559 (108)	All	All	Applies to totally enclosed lifeboats installed on or after 1 January 2029	All	All	Applies to totally enclosed lifeboats installed on or after 1 January 2029	<p>Ventilation means for Totally Enclosed Lifeboats:</p> <p>Amendments to LSA Code to add new ventilation requirements applied to totally enclosed lifeboats installed on or after 01 January 2029.</p> <p>Accordingly:</p> <ul style="list-style-type: none"> ▪ A totally enclosed lifeboat is to be provided with means to achieve a ventilation rate of at least 5 m3/h per person for the number of persons which the lifeboat is permitted to accommodate and for a period of not less than 24 hours. ▪ The goal is to maintain a habitable environment within the lifeboat. ▪ The ventilation means shall be operable from inside the lifeboat.

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									<ul style="list-style-type: none"> Where the means of ventilation is powered, the source shall not be the radio batteries and where dependent on the lifeboat engine, sufficient fuel shall be provided. <p>Subsequent to above amendments to the LSA Code requiring ventilation means for Totally Enclosed Lifeboats, Res. MSC. 559 (108) introduced the Annual thorough examination and operational test as per MSC. 402 (96) for the ventilation system of Totally Enclosed Lifeboats.</p> <p>Above is for information.</p>
5	SOLAS II-2	MSC.520(106)	All	All	01.01.2026	All	All	01.01.2026	<p>Safety measures on use of fuel oil:</p> <p>The amendments aim to regulate the supply of oil fuel that does not meet the flashpoint requirements in SOLAS regulation II-2/4.2.1 (i.e., the prohibition of using oil fuel with a flashpoint of less than 60°C).</p> <p>The amendment requires:</p> <ol style="list-style-type: none"> A declaration signed and certified by the oil fuel supplier's representative BEFORE bunkering, stating that the oil fuel complies with SOLAS regulation II-2/4.2.1 and specifying the test method used. Bunker Delivery Note (BDN) for the oil fuel DELIVERED to the ship shall contain either the flashpoint measured or a statement confirming that the flashpoint has been measured at or above 70°C. <p>Ship owners and operators are advised to ensure that vessels under their fleet obtains the necessary documentation confirming compliance with the flashpoint requirements (i.e., the oil fuel supplier's preliminary declaration certifying compliance with SOLAS II-2/4.2.1 & BDN indicating the oil fuel's flashpoint, etc.), before and after bunkering.</p>
6	IGC Code	MSC.523(106)	Gas Carriers	All	01.01.2026	Gas Carriers	All	01.01.2026	<p>Amendments to IGC Code – High Manganese Austenitic Steel</p> <p>The IGC Code has been amended to allow the use of high manganese austenitic steel for cryogenic service, as per MSC.523(106).</p> <p>Table 6.3 now includes high manganese austenitic steel, which can be used to construct plates, sections and forgings for cargo tanks, secondary barriers and pressure vessels, following the conditions in MSC.1/Circ.1599/Rev.2.</p> <p>Above is for information.</p>
7	IGF Code	MSC.524(106)	Ships using gases or other low-flashpoint fuels	All	01.01.2026	Ships using gases or other low-flashpoint fuels	All	01.01.2026	<p>Amendments to IGF Code - High Manganese Austenitic Steel</p> <p>Amendments to the IGF Code have introduced high manganese austenitic steel as a new construction material. Table 7.3 has been updated to include high manganese austenitic steel, which can now be used for fuel containment and piping systems, following the requirements in MSC.1/Circ.1599/Rev.2.</p> <p>Above is for information.</p>

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8	SOLAS II-2, FSS Code	MSC.550(108) MSC.555(108)	All	All	Ships the keels of which are laid or which are at a similar stage of construction on or after 1 January 2026	Passenger Ships	All	Not later than the first survey on or after 1 January 2028	<p>Amendments to SOLAS chapter II-2, Reg. 20 - Fire safety on ships fitted with vehicle, special category, open and closed ro-ro spaces and weather decks intended for the carriage of vehicles:</p> <p>These changes are based on the EMSA FIRESAFE studies (2016-2018), aiming to reduce fire risks on ro-ro passenger ships.</p> <p>Key amendments include the following:</p> <ul style="list-style-type: none"> The term 'ro-ro' spaces is now expanded to clarify ro-ro spaces as open and closed ro-ro spaces as well as weather decks intended for carriage of vehicles. Fixed Water-Based Fire-Extinguishing Systems: Requirements to Protect weather decks and ro-ro spaces with closing devices. Includes continuous video monitoring for existing ships. Linear Heat Detectors: Reg II-2/20.4.1 now requires smoke and heat detectors in vehicle, special category, and ro-ro spaces. Linear heat detectors are acceptable, if tested under normal ventilation conditions. Existing ships must also comply, and smoke detectors cannot be substituted. Video Monitoring: Amendments to Reg II-2/20.4.4 require effective video monitoring systems in these spaces. Systems must provide immediate playback capability and cover the entire space, with cameras high enough to see over cargo and vehicles. Arrangement of Openings in Ro/Ro and Special Category Spaces: Reg II-2/20.5.2 changes include the term "normally occupied service spaces" and specific safety distance requirements. Water Monitors for Existing Ships: Reg. II-2/20.6.2 mandates retrofitting existing ro-ro passenger ships with fixed water-based fire extinguishing systems for weather decks. New section 7 requires suitable signage and markings for fixed fire extinguishing systems in new ships, considering crew movement patterns and cargo obstructions. <p>Shipowners/ managers are advised to note the updated equipment and installation requirements for both new and existing ships fitted with vehicle, special category, open and closed ro-ro spaces and weather decks intended for the carriage of vehicles and accordingly plan for compliance with the new requirements.</p>
9	IGF Code	MSC.551(108)	All	All	Ships for which the building contract is placed on or after 1 January 2026; in the absence of a building contract, the keel of which is	All	All	01.01.2026	<p>Portable fire extinguishers in fuel preparation rooms:</p> <p>Amendments to paragraph 11.6.2 of part A-1 of the IGF Code, as adopted by resolution MSC.551(108), requires that in addition to any other portable fire extinguishers that may be required elsewhere in the IMO instruments, one portable dry powder extinguisher of at least 5 kg shall be placed in the fuel preparation rooms.</p> <p>Existing ships (ships constructed before 1 January 2026) shall meet this requirement no later than the first scheduled survey on or after 1 January 2026.</p> <p>The additional fire extinguisher provided will be reflected in the ship's fire control plan and endorsed by the attending Surveyor.</p>

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					laid, or which is at a similar stage of construction on or after 1 July 2026; or ships the delivery of which is on or after 1 January 2030				Ship owners/ Operators are advised to take note of above and accordingly ensure that additional portable dry powder extinguisher of at least 5 kg is placed in the fuel preparation room no later than the first scheduled survey on or after 1 January 2026.																										
10	IMSBC Code	MSC.575(110)	Ships carrying IMSBC Cargo	All	1 January 2027. Administrations may apply it on a voluntary basis as from 1 January 2026.	Ships carrying IMSBC Cargo	All	1 January 2027. Administrations may apply it on a voluntary basis as from 1 January 2026.	<p>The amendments (08-25) to IMSBC Code includes (but is not limited to);</p> <p>1. Updated terminology, clearer separation requirements for radioactive materials, and removal of outdated references to “MHB.”</p> <p>2. Footnotes and references have been updated for clarity and alignment with the latest safety practices.</p> <p>3. Revisions to various existing individual schedules for solid bulk cargoes.</p> <p>4. Following new schedules have been added to Appendix 1 of the Code:</p> <table><thead><tr><th>Cargo</th><th>Group</th></tr></thead><tbody><tr><td>Aluminium Sulphate Granular</td><td>B</td></tr><tr><td>Apatite Concentrate</td><td>A</td></tr><tr><td>Asphalt Granulates</td><td>C</td></tr><tr><td>Crushed Granodiorite (Coarse)</td><td>C</td></tr><tr><td>Ferric Sulphate Granular</td><td>B</td></tr><tr><td>Fish Meal (Stabilized)</td><td>C</td></tr><tr><td>Fish Scrap (Stabilized)</td><td>C</td></tr><tr><td>Iron Ore Briquettes</td><td>C</td></tr><tr><td>Pea Protein Concentrate Pellets</td><td>C</td></tr><tr><td>Phosphate Rock Fines (uncalcined)</td><td>A</td></tr><tr><td>Tuff (Coarse)</td><td>C</td></tr><tr><td>Zinc Slag (Coarse)</td><td>C</td></tr></tbody></table> <p>5. MSC.1/Circ.1395/Rev.7 was adopted – Lists of solid bulk cargoes for which a fixed gas fire extinguishing system may be exempted or for which a fixed gas fire extinguishing system is ineffective.</p> <p>Following new cargo is added in MSC.1/Circ.1395/Rev.7</p>	Cargo	Group	Aluminium Sulphate Granular	B	Apatite Concentrate	A	Asphalt Granulates	C	Crushed Granodiorite (Coarse)	C	Ferric Sulphate Granular	B	Fish Meal (Stabilized)	C	Fish Scrap (Stabilized)	C	Iron Ore Briquettes	C	Pea Protein Concentrate Pellets	C	Phosphate Rock Fines (uncalcined)	A	Tuff (Coarse)	C	Zinc Slag (Coarse)	C
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									<ul style="list-style-type: none"> Aluminium Sulphate Granular Castor Beans UN 2969 <p>Where a vessel intends to carry any of above cargo(es) listed in IMO Circular MSC.1/Circ.1395/Rev.7 and seeks exemption from a fixed gas fire extinguishing system, IRS may be contacted for issuance of necessary exemption certificate in concurrence with the Flag Administration.</p>
11	IMDG Code	MSC.556(108)	Ships carrying IMDG Cargo	All	1 January 2026 Administrations may apply it on a voluntary basis as from 1 January 2025.	Ships carrying IMDG Cargo	All	1 January 2026 Administrations may apply it on a voluntary basis as from 1 January 2025.	<p>Amendments to the IMDG Code: The IMDG Code is regularly reviewed to take into account new requirements for existing substances or new substances.</p> <p>In addition to the regular updates to classification, segregation, packing and markings of dangerous goods, amendment 42-24 includes:</p> <ul style="list-style-type: none"> Segregation requirements for alcoholates. Amendments to SG 53 and SG 48 regarding liquid organic substances. Amendments to UN 1362 PG II and UN 1362 to clarify the differences between carbon-related substances particularly with regard to charcoal. A new special provision and handling code for medical waste. Amendments have also been made to the footnotes in the IMDG Code. Several footnotes in the IMDG Code were found to use mandatory language. These have now been included in the main body of the Code. <p>The amendments are pertaining to operational requirements and are to be complied with when carrying dangerous goods.</p>
12	Grain Code	MSC.552(108)	All	All	01.01.2026	All	All	01.01.2026	<p>Vessels issued with Document of Authorization for the carriage of Grain:</p> <p>The Grain Code is revised to introduce a new class of loading condition ‘specialty suitable compartment partly filled in way of the hatch opening, with ends untrimmed’.</p> <p>On or after 1 January 2026, prior to carrying grain in bulk under the new class of loading conditions introduced vide Resolution MSC. 552 (108), the ship’s grain loading stability manual is to be updated and approved towards compliance with the amendments of the Grain Code in accordance with resolution MSC.552(108).</p> <p>Alternatively, an addendum to the approved grain loading stability manual with the new condition is to be prepared and approved.</p> <p>Ship owners/ managers are advised to take note of above and ensure that the ship’s grain loading stability manual is updated and re-approved towards compliance with the amendments of the Grain Code in accordance with resolution MSC.552(108) prior to carrying grain in bulk under the new class of loading conditions.</p>

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13	ESP Code	MSC.553(109)	All	All	01.01.2026	All	All	01.01.2026	Amendments to 2011 ESP Code: <ul style="list-style-type: none"> IMO vide Resolution MSC. 553 (108) adopted amendments to the ESP Code clarifying that approval and certification of a firm engaged in thickness measurement of hull structures as per ESP Code can be undertaken by the Recognized Organizations or the flag Administration itself and will enter into force on 01 January 2026. <p>Above is for information.</p>
14	SOLAS II-1/ 3-2 & II-1/3-11 – Performance Standards for Protective Coatings	MSC.557(108) MSC.558(108)	All	All	01.01.2026	All	All	01.01.2026	Change of name of PSPC qualified coating inspectors: <p>SOLAS Regulation II-1/ 3-2 and II-1 /3-11 stipulates performance standards for protective coatings as per Resolutions, MSC 215 (82) & MSC 288(87). These Resolutions requires ‘NACE Coating Inspector Level 2’ as one of the coating inspector qualifications related to Performance Standards for Protective Coatings (PSPC).</p> <p>NACE International recently changed its name to Association for Materials Protection and Performance (AMPP). As a result, the name of the coating inspector qualification is changed to AMPP Certified Coating Inspector.</p> <p>To reflect the change, MSC 108 adopted the minor corrections to the two (2) PSPC.</p> <p>Above is for information.</p>
15	IGC Code	MSC.566(109)	Gas Carriers	All	01.07.2026	Gas Carriers	All	01.07.2026	Amendments to the IGC Code: <p>Existing IGC Code, Paragraph 16.9.2 prohibits the use of cargoes identified as toxic products as fuel.</p> <p>Vide MSC. 566 (109), Paragraph 16.9.2 of the IGC Code was amended as follows:</p> <ol style="list-style-type: none"> The prohibition on using cargoes as fuel now applies only to toxic cargoes that require the carriage in type 1G ship, which have the highest safety containment requirements; and Toxic cargoes required to be carried on type 2G/2PG ships, such as Ammonia, may be used as ship’s fuel with the approval from the Administration, provided that the same level of safety as natural gas is maintained. <p>Unlike the use of LNG cargo as fuel, for which chapter 16 of the IGC Code provides detailed requirements, the use of Ammonia cargo as ship’s fuel requires flag Administration’s authorization as an equivalent based on the guidelines to be developed by the Organization.</p> <p>Flag Administrations may voluntarily early-implement the amendments before 1 July 2026, in accordance with MSC.1/Circ.1681.</p> <p>Above is for information and compliance.</p>

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16	MARPOL Annex VI (Designation of NOx ECA – Norwegian Sea & Canadian Arctic)	MEPC.392(82)	All	All	See Remarks	-	-	-	<p>NOx ECA - Sea areas newly designated as ECA - Norwegian Sea & Canadian Arctic:</p> <p>NOx Tier III regulation will apply to marine diesel engines installed on the following ships and operated in these ECA on or after 1 March 2026.</p> <p>1. Canadian Arctic Area</p> <ul style="list-style-type: none"> Ships the keels of which are laid or that are at a similar stage of construction on or after 1 January 2025. <p>2. Norwegian Sea Area:</p> <ul style="list-style-type: none"> Ships for which the building contract is placed on or after 1 March 2026 In the absence of a building contract, ships the keels of which are laid or which are at a similar stage of construction on or after 1 September 2026 Ships delivered on or after 1 March 2030 <p>Above is for information</p>
17	MARPOL Annex VI (Designation of SOx ECA – Norwegian Sea & Canadian Arctic)	MEPC.392(82)	All	All	01.03.2027	All	All	01.03.2027	<p>SOx ECA - Sea areas newly designated as ECA - Norwegian Sea & Canadian Arctic:</p> <p>Amendments to MARPOL Annex VI were adopted, designating Canadian Arctic area and Norwegian Sea area as ECA for SOx compliance.</p> <p>The sulphur content in fuel oil used for ships operating in these ECA will be limited to 0.10% from 1 March 2027.</p> <p>Above is for information and compliance.</p>
18	SOLAS V/31 & V/32	MSC.550 (108)	All	All	01.01.2026	All	All	01.01.2026	<p>Reporting of Containers lost at Sea:</p> <ul style="list-style-type: none"> MSC 108 adopted amendments to SOLAS regulations V/31.2 and V/32.3 to create a mandatory reporting procedure for lost containers at sea, effective January 1, 2026. These changes will require ships to report the loss or sighting of containers to improve safety and facilitate tracking and recovery efforts. New regulation V/31.2 specifies the role and responsibility of concerned parties, i.e. master, shipping company, and flag Administrations, in case of losing onboard containers or observing lost containers at sea, and new regulation V/32.3 scopes the information to be reported. <p>Above is for information and compliance.</p>

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19	STCW Code	MSC.560 (108)	All	All	01.01.2026	All	All	01.01.2026	<p>Training of seafarers for prevention of, and response to, violence and harassment (STCW Code):</p> <ul style="list-style-type: none"> MSC 108 adopted the amendments of the STCW Code to include, in the table A-VI/1-4, new competence for training all seafarers to prevent, and response to, violence and harassment, including sexual harassment, bullying and sexual assault. These amendments will enter into force on 1 January 2026. Seafarers will be required to undergo updated training as part of their basic safety courses, given that STCW Table A-VI/1-4 forms part of basic training. The revised course will cover the new requirements, focusing on the prevention of and response to violence and harassment. <p>Ship Owners/ managers to note the above requirements and ensure that:</p> <ul style="list-style-type: none"> ✓ All Seafarers have completed the revised “Minimum standards of competence in personal safety and social responsibilities (PSSR)” course covering the new requirements and have upgraded their PSSR Certificate. ✓ Review Safety Management Systems, to include the required Policies and procedures on the prevention of and response to violence and harassment.