



FLEET PRESERVE  
— MARINE CONSULTANTS —

TECHNICAL ADVISORY · FP-TA 02/2026

# The 2027 Compliance Calendar

What applies from 1 January 2027 — and what follows

A single view of the IMO and EU requirements that hit bulk carriers and general cargo ships from the beginning of 2027 onwards: the IMSBC Code, CII, new Emission Control Areas, lifting appliances, pilot transfer arrangements, the enhanced DCS and EU ETS / FuelEU — with dates, who is affected and what to do first.

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## 1 Jan 2027

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IMSBC Amendment 08-25 mandatory · CII factor rises to 13.625 %

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## 1 Mar 2027

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0.10 % sulphur in the Canadian Arctic and Norwegian Sea ECAs

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## 1 Jan 2028

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Pilot transfer arrangements (SOLAS V/23) — Parts D & E for all ships

2027 is the year in which several requirements adopted in 2024–2025 start to bite at the same time. Individually each is manageable. Together they compete for the same budget, the same dry-dock windows and the same people — which is why they should be planned as one programme.

## 10

Requirements and developments reviewed for 2027–2030

## 5

With a fixed date in 2027 that affects dry-bulk and general cargo ships

## Q4 2026

Last quarter to plan before the first 2027 deadlines

### Five things every Technical Manager needs to know

- 1 **IMSBC 08-25 is mandatory on 1 January 2027** — twelve new cargo schedules, fish meal back to Class 9 (dangerous-goods Document of Compliance needed). See FP-TA 04/2026.
- 2 **The CII squeeze accelerates.** Reduction factor 13.625 % in 2027 rising to 21.5 % in 2030; many C-rated bulkers become D in 2027. See FP-TA 03/2026.
- 3 **New ECAs.** 0.10 % sulphur from **1 March 2027** in the Canadian Arctic and Norwegian Sea ECAs; the North-East Atlantic ECA enters into force on 1 September 2027 with the 0.10 % limit twelve months later.
- 4 **Two SOLAS retrofits run through 2027.** Lifting appliances (SOLAS II-1/3-13) at each ship's first renewal survey on or after 1 January 2026, and pilot transfer arrangements (V/23, MSC.576(110)) to be ready for 1 January 2028. See FP-TA 01/2026.
- 5 **Data and money.** First full enhanced-DCS report (2026 data) by 31 March 2027; EU ETS allowances for 100 % of 2026 emissions surrendered by 30 September 2027.

#### Two developments to watch

**IMO Net-Zero Framework** — adoption adjourned in October 2025; negotiations continue without a timeline.

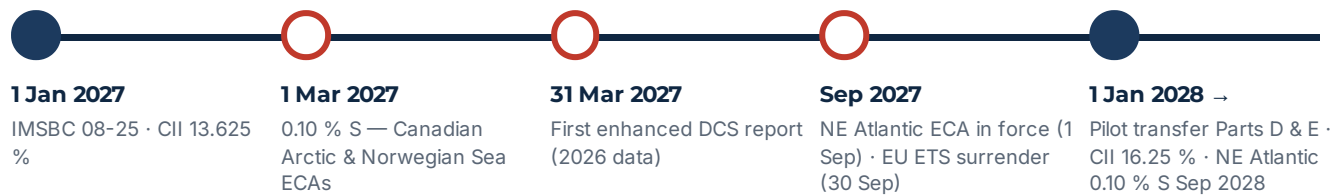
**BWM Convention amendments** — adopted at MEPC 84, expected in force spring 2028.

#### Our recommendation

Build one fleet compliance plan for 2027–2029: ships in rows, requirements in columns, with each ship's surveys and dry-docks. Structural work for lifting appliances and pilot transfer belongs in the same yard specification; CII measures in the same dry-dock.



## Timeline



## What applies to your ship — and when

| Requirement                                      | Date                                              | Applies to                                   | Instrument                        | Status   |
|--------------------------------------------------|---------------------------------------------------|----------------------------------------------|-----------------------------------|----------|
| IMSBC Code Amendment 08-25                       | 1 Jan 2027                                        | All ships carrying solid bulk cargoes        | SOLAS VI/VII · MSC.575(110)       | IN FORCE |
| CII reduction factor 13.625 % (→ 21.5 % in 2030) | 1 Jan 2027                                        | Ships ≥5,000 GT                              | MARPOL VI reg. 28 · MEPC.400(83)  | IN FORCE |
| Enhanced IMO DCS — first full report (2026 data) | 31 Mar 2027                                       | Ships ≥5,000 GT                              | MARPOL VI App. IX                 | IN FORCE |
| Canadian Arctic & Norwegian Sea ECAs — 0.10 % S  | 1 Mar 2027                                        | All ships in the areas (Tier III: new ships) | MARPOL VI reg. 14 / 13            | NEW AREA |
| North-East Atlantic ECA                          | 1 Sep 2027 (0.10 % S from 1 Sep 2028)             | All ships in the area (Tier III: new ships)  | MARPOL VI · MEPC 84               | NEW AREA |
| EU ETS — 100 % surrender for 2026 emissions      | 30 Sep 2027                                       | Ships ≥5,000 GT, EU voyages                  | Directive 2003/87/EC as amended   | IN FORCE |
| Lifting appliances — existing installations      | First renewal survey ≥1 Jan 2026                  | Cargo, ER, stores, hose cranes               | SOLAS II-1/3-13 · MSC.1/Circ.1663 | RETROFIT |
| Pilot transfer arrangements                      | 1 Jan 2028 (Parts D & E) · 1st survey ≥1 Jan 2029 | All SOLAS ships                              | SOLAS V/23 · MSC.576(110)         | RETROFIT |
| BWM Convention amendments                        | Expected spring 2028                              | Ships with BWMS                              | MEPC 84                           | WATCH    |
| IMO Net-Zero Framework                           | Not adopted — no timeline                         | Ships ≥5,000 GT                              | MARPOL VI (draft)                 | WATCH    |

Dates as adopted by IMO / EU at the time of writing (October 2026). ECA Tier III NOx requirements apply only to ships meeting the contract / keel / delivery dates set for each ECA. Always confirm the flag State's position and any national requirements.

## Requirement by requirement (1/2)

1 JAN 2027

### IMSBC Code Amendment 08-25

- 12 new schedules (Group A: apatite concentrate, phosphate rock fines); 11 amended.
- FISH MEAL UN 2216 → Class 9: check the DG Document of Compliance.
- DRI (A) loading criteria; iron ore pellets density; segregation table 9.3.3.
- **Action:** new Code edition on board, DoC review, Master checklist.

Details: FP-TA 04/2026

1 JAN 2027 – 2030

### CII — tighter every year

- $Z = 13.625\%$  (2027),  $16.25\%$  (2028),  $18.875\%$  (2029),  $21.5\%$  (2030).
- D for 3 years or E once → corrective action plan in SEEMP Part III.
- Speed, idle time, hull/propeller and data quality are the main levers.
- **Action:** 2027–2030 projection per ship; measures before Jan 2027.

Details: FP-TA 03/2026

1 MAR 2027

### Canadian Arctic & Norwegian Sea ECAs

- NOx Tier III in force since 1 March 2026 for qualifying new ships.
- **0.10 % sulphur** limit (or equivalent scrubber operation) from 1 March 2027.
- Fuel change-over procedure, log entries and sufficient compliant fuel before entry.
- **Action:** update fuel change-over procedures and voyage planning.

1 SEP 2027 / 1 SEP 2028

### North-East Atlantic ECA

- Adopted at MEPC 84; enters into force 1 September 2027.
- **0.10 % sulphur** applies 12 months later (1 September 2028).
- Tier III for ships contracted on/after 1 Jan 2027, keel laid on/after 1 Jul 2027 or delivered on/after 1 Jan 2031.
- **Action:** include in fuel strategy and bunkering plans for European trades.

31 MAR 2027

### Enhanced IMO DCS

- Fuel by consumer and fuel type; underway vs. not underway.
- Laden distance, transport work, shore power, innovative technologies.
- First full report (calendar 2026) to the Administration/RO by 31 March 2027.
- **Action:** check noon/event reports now — errors cannot be fixed after year-end.

30 SEP 2027

### EU ETS & FuelEU Maritime

- EU ETS: allowances for 100 % of verified 2026 emissions by 30 September 2027.
- Offshore ships  $\geq 5,000$  GT join the EU ETS from 1 January 2027.
- FuelEU: GHG-intensity limit  $-2\%$  vs. 2020 until 2029,  $-6\%$  from 2030.
- **Action:** align ETS cost clauses and FuelEU pooling / compliance strategy.

## Requirement by requirement (2/2)

### RENEWAL SURVEY ≥ 1 JAN 2026

#### Lifting appliances — SOLAS II-1/3-13

- Cargo cranes, engine-room, provision and hose-handling cranes (flag may exempt SWL <1 t).
- Existing appliances: comply by the first renewal survey on or after 1 January 2026.
- Testing and thorough examination per MSC.1/Circ.1663; SWL marked; register and certificates on board.
- Uncertified appliances: SWL nominated from maker data, then load-tested before use.
- **Action:** list every crane and its survey date; plan load tests with the renewal survey.

### 1 JAN 2028 · 1ST SURVEY ≥ 2029

#### Pilot transfer arrangements — SOLAS V/23

- Parts D & E for all ships from 1 January 2028: inspections, 30/36-month service life, spares, familiarisation.
- Parts A–C for existing ships by the first survey on or after 1 January 2029.
- Strong points ≥48 kN, type-approved ladders and intermediate securing device.
- **Action:** gap assessment now; structural work at 2027 dry-docks.

Details: FP-TA 01/2026

### EXPECTED SPRING 2028

#### BWM Convention amendments

- Amendments adopted at MEPC 84; entry into force expected in spring 2028.
- Scope to be confirmed from the final adopted text and class summaries.
- **Action:** watch the final text; meanwhile keep BWMS in good order and the electronic Ballast Water Record Book up to date.

### NOT ADOPTED

#### IMO Net-Zero Framework

- Global fuel standard and GHG pricing — adoption adjourned October 2025.
- MEPC 84 continued negotiations; no adoption timeline set.
- CII and EU ETS / FuelEU remain the rules that apply now.
- **Action:** monitor; do not delay CII measures waiting for it.

## Also on the horizon for bulk carriers

| Item                                                     | What it means                                                                                                         | Status     |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|------------|
| Enhanced Survey Programme — remote inspection techniques | Draft amendments allowing remote inspection techniques for close-up surveys of existing bulk carriers and oil tankers | DRAFT      |
| Revised recommendations for entering enclosed spaces     | Revision of Resolution A.1050(27) — update SMS procedures, atmosphere testing and drills                              | UPDATE SMS |
| Emergency towing — ships >20,000 GT (non-tankers)        | New interim guidelines for emergency towing arrangements                                                              | GUIDANCE   |
| PSC Concentrated Inspection Campaigns                    | 2025: Ballast water · 2026: Cargo securing (Paris/Tokyo MOU). Prepare for the 2027 topic as soon as it is announced   | WATCH      |



## Quarter-by-quarter plan

A practical sequence for a fleet of bulk carriers and general cargo ships. Adjust to each ship's survey and dry-dock dates.

| When         | What                                                                                                                                                           | Who                     |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| Q4 2026      | Fleet gap assessments (pilot transfer, lifting appliances); CII projection 2027–2030; IMSBC 08-25 readiness and DoC review; update fuel change-over procedures | Technical · Ops · HSSQE |
| Jan 2027     | IMSBC 08-25 mandatory; CII 13.625 %; enhanced DCS data collection continues; Master briefings                                                                  | Ops · Masters           |
| Feb–Mar 2027 | Canadian Arctic / Norwegian Sea 0.10 % S (1 Mar); DCS 2026 report (31 Mar); Class submissions for pilot-transfer / crane modifications                         | Performance · Technical |
| Q2 2027      | CII 2026 rating issued; corrective action plans where needed; type-approved equipment specifications                                                           | Technical · Purchasing  |
| Q3 2027      | NE Atlantic ECA in force (1 Sep); EU ETS surrender for 2026 (30 Sep); dry-dock works for pilot transfer and lifting appliances                                 | Technical · Commercial  |
| Q4 2027      | Type-approved ladders delivered; SMS package and crew familiarisation; pre-2028 verification                                                                   | HSSQE · Masters         |
| 2028         | Pilot transfer Parts D & E (1 Jan); CII 16.25 %; BWM amendments (spring); NE Atlantic 0.10 % S (1 Sep)                                                         | All                     |

## Action register

| #             | Action                                                                                                | Owner               | Target      |
|---------------|-------------------------------------------------------------------------------------------------------|---------------------|-------------|
| <b>Office</b> |                                                                                                       |                     |             |
| 1             | Build a fleet compliance matrix 2027–2029 (ships × requirements × surveys/dry-docks)                  | Technical Manager   | Nov 2026    |
| 2             | Combine yard specifications: pilot transfer, cranes, CII technical measures                           | Superintendents     | Q1 2027     |
| 3             | Budget 2027: equipment, yard work, Class/Flag approvals, ETS allowances                               | Technical / Finance | Dec 2026    |
| 4             | Charter-party review: CII clause, ETS cost pass-through, IMSBC cargo exclusions                       | Commercial          | Dec 2026    |
| 5             | SMS revision: cargo acceptance, fuel change-over, pilot transfer, lifting appliances, enclosed spaces | HSSQE / DPA         | Q2–Q3 2027  |
| <b>Vessel</b> |                                                                                                       |                     |             |
| 6             | Verify crane certificates, SWL marking and register; report missing documents                         | C/O / C/E           | Dec 2026    |
| 7             | Accurate noon / event reporting for DCS and CII (underway / not underway, fuel by consumer)           | Master / C/E        | Ongoing     |
| 8             | Pilot ladder inventory with manufacture / in-service dates; remove banned fixings                     | C/O                 | Immediately |



## How Fleet Preserve can help

Fleet Preserve is an independent marine surveying and technical consultancy in Athens, Greece. Our naval architects and marine engineers have more than 18 years of hands-on experience in fleet technical management, dry-docking, PSC, vetting and ISM auditing on bulk carriers and general cargo ships. One team, one plan for all of 2027.

### 01

#### 2027 fleet compliance plan

Ship-by-ship matrix of every requirement in this advisory, aligned with your survey and dry-dock schedule, with budget categories and owners.

### 02

#### Gap surveys & engineering

Onboard gap surveys for pilot transfer arrangements and lifting appliances; strong-point and structural checks; drawings for Class/Flag; yard specifications.

### 03

#### CII & DCS

CII projection 2027–2030, measures plan, SEEMP Part III and corrective-action plans, data-quality audit.

### 04

#### SMS & cargo readiness

IMSBC 08-25 readiness and DoC review, SMS procedures and checklists, crew briefings, pre-PSC and pre-vetting verification.

### Book a 2027 planning session

Send us your fleet list with survey and dry-dock dates. We will respond with a tailored scope, programme and quotation.

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#### RELATED ADVISORIES

FP-TA 01/2026 Pilot Transfer Arrangements · FP-TA 03/2026 CII 2027–2030 · FP-TA 04/2026 IMSBC Code Amendment 08-25

#### REFERENCES

IMO Resolutions MSC.575(110) (IMSBC 08-25), MSC.572(110) and MSC.576(110) (pilot transfer), MEPC.400(83) (CII reduction factors) · SOLAS II-1/3-13 and MSC.1/Circ.1663 (lifting appliances) · MARPOL Annex VI and Appendix IX (DCS) · UK P&I Club, IMO Regulatory Update 2026 · Lloyd's Register Class News 02/2026 and 13/2025 · DNV, IMO MSC 110 and MEPC 84 summaries · Bureau Veritas, New SOLAS requirements for lifting appliances · Riviera Maritime Media, Canadian Arctic and Norwegian Sea ECAs · ABS, EU ETS inclusion of maritime emissions.

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