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CIRCULAR

# Maritime GHG Emissions: Key Deadlines and Activities for 2026

C25067 | 16 December 2025

Notification to: Ship Owners/ Managers/ Operators

## Introduction

This circular provides a consolidated overview of the key deadlines, verification steps, and practical planning milestones for maritime emissions reporting and compliance in **2026**. It covers EU MRV, EU ETS, UK MRV, FuelEU, IMO DCS, and CII, highlighting submission timelines, verification requirements, and recommended actions to enable timely submissions and consistent compliance.

## Actions

Please submit the following information to DBS Verification Division ([environmental@dromon.com](mailto:environmental@dromon.com)) no later than **22 December 2025**:

- Number of vessels in your fleet that called at EU and/or UK ports during the 2025 reporting period
- Number of voyages for each of the vessel(s) listed above

For each identified ship, please submit the relevant emissions data and supporting documentation by **31<sup>st</sup> of January of 2026**. To facilitate timely processing and scheduling, **priority** will be given to companies that submit all required reports and supporting evidence within the above deadlines.

For detailed submission requirements and supporting documentation, please refer to the [QSP10-1/Form 06 Pre-verification guidelines](#).

## Deadlines

### EU MRV - European Union Monitoring, Reporting and Verification

- **31 March 2026:** Ship and company level emissions data should be submitted to THETIS-MRV platform and reported as verified by an accredited verifier.
- Administering Authorities (AAs) may request verified data to be submitted may request verified data earlier than 31 March (but not before 28 February).

### EU ETS - European Union Emissions Trading System

- **31 March 2026:** Verified company level emissions data (reported under EU MRV in THETIS) to be entered into the Union Registry by a regulated entity using a Maritime Operator Holding Account (MOHA) reported as verified by the AA/accredited verifier.
- **30 September 2026:** Surrender of due EU ETS Allowances from the MOHA.
- If data are not submitted by 1 April 2026, the MOHA will be blocked. Where company no longer falls within EU ETS scope, it may request the AA to set its MOHA status to “*excluded*”, subject to AA approval.

### Fuel EU Maritime

- **31 January 2026:** Submit FuelEU report to the accredited verifier.
- **31 March 2026:** Completion of verification of the FuelEU report.
- **30 April 2026:** Approval of the ship’s compliance balance in the FuelEU database, including any applied flexibility mechanisms.
- **30 June 2026:**
  - Issuance of FuelEU Documents of Compliance (DoCs) for compliant ships (valid until 30 June of the following year).
  - Ships must carry a valid DoC when entering EEA ports.
  - Payment of any applicable FuelEU penalties.

### UK MRV - UK Monitoring, Reporting and Verification

- **30 April 2026:** Emissions data to be verified by an accredited verifier.
- The UK does not have access to the EU THETIS-MRV platform. Until the UK digital reporting platform becomes operational, verified data should be retained.
- **UK ETS:** A company-level ETS emissions report is not yet required for maritime; implementation is expected from **July 2026**.

### IMO DCS (Data Collection System) SEEMP Part II, SEEMP Part III & CII (Carbon Intensity Indicator)

- **01 January 2026:** SEEMP Part III to be available onboard, including the three-year CII improvement plan (2026–2028).
- **31 March 2026:** Annual emissions data to be submitted to the verifier.
- **31 May 2026:** Verification completed and Statement of Compliance issued on behalf of the Administration.
- **30 June 2026:** Submission of verified data into the IMO GISIS platforms on behalf of the Administration by the verifier.

## Act now

Shipowners, managers and operators are strongly encouraged to take proactive measures to ensure compliance with the forthcoming deadlines and milestones. Accurate emissions data are essential, as they can significantly affect costs, potential penalties, and financial decision. Close monitoring of regulatory updates and issued circulars is highly advised.