MSIG
SPECIALTY MARINE

REGULATORY UPDATE 2026

CIRCULAR

MSIG Specialty Marine N.V. wishes to inform its clients about some of the more important updates of the rules and regulations, which will have an impact on shipping in 2026 and beyond.

DECEMBER 2025

Index

International Grain Code

Effective as of 1 January 2026

New provisions will enter into force regarding the handling of partially filled compartments and the calculation of heeling moments.

The amendments to the Code introduce a new, optional loading condition: a specially suitable compartment, partly filled in way of the hatch opening, with ends untrimmed.

Shipowners and operators must ensure that any vessel intending to load grain under this newly defined optional condition on, or after 1 January 2026 includes this condition in its approved Grain Loading Manual.

Approval of Grain Loading Manuals

Operators may submit their amended Grain Loading Manual (or an addendum to the existing manual) to their classification society for review and approval in advance of 1 January 2026.

International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels (IGF Code)

Effective as of 1 January 2026

- The pressure relief system for each liquefied-gas fuel tank must be sized so that, even if one pressure relief valve (PRV) fails or is inoperative, the remaining PRVs still meet the combined relieving capacity requirement.
- At bunkering manifolds, when connections other than those complying with ISO 21593:2019 are used, they must be paired with operational procedures ensuring a dry-disconnect.
- Requirements for emergency release systems at the bunkering manifold are specified.
- For single-fuel installations, amendments to the redundancy of the fuel supply system (i.e., ensuring alternate supply pathways) are introduced.
- The design pressures of ventilated ducts and outer pipes of gas-fuel piping (with design pressures ≤ 1.0 MPa) can now be based on the maximum built-up pressure and local instantaneous peak pressure due to inner-pipe rupture.
- A portable dry-powder fire extinguisher must be provided in fuel-preparation rooms for all ships using low-flashpoint fuels, regardless of construction date.
- Hazardous-area zone category for inter-barrier spaces has been changed from Zone 1 to Zone 0.
- Level indicators (penetrating tanks) for liquefied-gas fuel tanks must comply with specified requirements.
- Use of high-manganese austenitic steel as material for fuel containment systems and piping is allowed, subject to specified conditions and testing.

International Code for the Construction and Equipment of Ships Carrying Liquefied Gases in Bulk (IGC Code)

Key amendments to the IGC Code

- Pressure Relief Systems for Liquefied-Gas Fuel Tanks: each liquefied-gas fuel tank must have a pressure relief system designed so that, even if one pressure relief valve (PRV) is inoperative, the remaining PRVs together still meet the total required relieving capacity.
- Bunkering Manifold Connections and Dry-Disconnect: when manifold connections other than those compliant with ISO 21593:2019 are used, they must be paired with operational procedures ensuring a dry-disconnect. Additional requirements have been introduced for emergency release systems (ERS) at the bunkering manifold.
- Redundancy of Fuel Supply Systems for Single-Fuel Installations: for ships using a single low-flashpoint fuel, the amendments clarify the need for redundant fuel supply arrangements, ensuring that the failure of one pathway does not cause total fuel loss.

- Design Pressure for Ventilated Ducts / Outer Pipes: for gas-fuel piping systems with outer pipes or ducts designed for ≤ 1.0 MPa, the design pressure may now be determined based on the maximum built-up pressure and local peak pressure resulting from inner-pipe rupture (revised paragraph 9.8.1).
- Portable Fire-Extinguishing Equipment in Fuel-Preparation Rooms: a portable dry-powder fire extinguisher must now be provided in every fuel-preparation room on ships using low-flashpoint fuels, regardless of construction date.
- Hazardous-Area Classification: the hazardous-area category for inter-barrier spaces (spaces between inner and outer containment layers) has been changed from Zone 1 to Zone 0 for ships constructed on or after 1 January 2026.
- Level Indicators for Liquefied-Gas Fuel Tanks: for ships constructed on or after 1 January 2026, tank level-measuring instruments that penetrate the tank must comply with updated safety and design requirements.
- Fuel-Supply System Venting on Automatic Shutdown: paragraphs 9.4.7 and 9.4.8 have been replaced.
- Double-Wall Piping in Gas-Safe Machinery Spaces (Paragraph 9.6.1.1): for ships constructed on or after 1 January 2026, gas-fuel piping located in gas-safe machinery spaces must be fully enclosed by a double wall or duct. Their inter-space must be pressurized with inert gas at a pressure greater than the gas-fuel pressure, and alarms for loss of inert-gas pressure should be in place.

International Maritime Dangerous Goods Code (IMDG Code)
Effective as of 1 January 2026

Amendment 42 to the IMDG Code (published in October 2024) will formally enter into force. Amendment 41 is not to be used anymore from then on.

Parties in the transportation chain are advised to check that the proper amendment is used when shipping and carrying dangerous goods in packaged form in 2026. Changes in Amendment 42 concern, among numerous others, revised entries of lithium batteries and vehicles fitted with lithium-based batteries, as well as a new entry for sodium ion batteries.

Furthermore, documentary requirements are amended, and requirements for the installation and their certification on safety of data loggers, sensors and tracking devices within cargo transport units are stipulated. Additionally, the Emergency Response Procedures for Ships Carrying Dangerous Goods (EmS Guide) have been revised.

Amendment 42 may be used until 31 December 2027.

UK Emission Trading System (ETS)
Effective as of 1 July 2026

The UK is to implement, much like the EU, an Emission Trading System (UK ETS). While it is expected to expand, the initial scope will cover:

- Domestic voyages defined as trips between UK ports as well as trips beginning and ending in the same UK port.
- In-port emissions – encompassing all emissions while sailing, anchored or moored within UK waters.
- Covers (for now) vessels over 5,000 GT, in the future also below this threshold.

The new scheme covers carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) from combustion and slippage.

The UK ETS is a cap-and-trade system where a cap is set on the total amount emitted, operators are to hold allowances for every tonne of CO_2 emitted. Additional permits for purchase are required in case of emission amounts exceeding the allowances. Conversely, unused allowances can be sold on.

Shipowners and operators should monitor, report and verify their emissions data. This will require setting up an emissions monitoring plan, appointing independent verifiers as well as submitting their annual emissions data.

International Convention for the Prevention of Pollution from Ships (MARPOL)
Effective as of 1 March 2026

Following the IMO amendments to MARPOL Annex VI (Resolution MEPC.392(82)), two new Emission Control Areas (ECA) were established in respect of nitrogen oxides (NO_X), sulphur oxides (SO_X), and particulate matter. These are the Canadian Arctic ECA and the Norwegian Sea ECA, where stricter limits on ships' emissions will apply. The amendment also requires that all new engines installed on ships built on or after 1 March 2026 shall comply with Tier III NO_X standards when operating in these areas.

Effective as of 1 September 2026

The NO_X Technical Code has been amended to address the re-certification of engines that are subject to substantial modification, or that are being certified to a Tier to which the engine was not certified at the time it was installed. Thus, any marine diesel engine with a power output exceeding 130kW, which has been substantially modified to alter its NO_X parameters or its original NO_X Tier, shall follow the newly introduced certification procedure.

International Convention for the Safety of Life at Sea (SOLAS)

Effective as of 1 January 2026

SOLAS II-1

- **Regulation 3-13:** New requirements regarding lifting appliances and anchor winches.
  For lifting appliances: those installed on or after 1 January 2026 need to comply with requirements of a classification society recognised by the Administration. For all installations, load tests need to be carried out and certified, accompanied by permanent SWL markings on these installations. Reference is made to MSC.1/Circ.1663 Guidelines for Lifting Appliances.
  For anchor winches: those installed on or after 1 January 2026 shall be designed, constructed and tested to the satisfaction of the Administration. All older installations shall be tested and examined, with reference to MSC.1/Circ. 1662 Guidelines for Anchor Handling Winches, no later than the first renewal date of the relevant (safety construction) certificates.
  This Regulation applies to lifting appliances, anchor handling winches and loose gear with a SWL of 1,000 kgs or more; below 1,000 kgs the Administration may determine the level of compliance.
  The Regulation does not apply to lifting appliances on Mobile Offshore Drilling Units (MODUs), offshore construction vessels, integrated equipment for hatch cover handling and live-saving launching equipment which comply with the International Live-Saving Appliances (LSA) Code.

SOLAS II-2

- Provisions to prohibit firefighting foams containing perfluorooctane sulfonic acids (PFOS) enter into force and are to be complied with by manufacturers as of 1 January 2026, and by shipowners before the date of annual, periodical or renewal surveys, whichever comes first, after 1 January 2026.
  The High-Speed Craft Codes (HSC Codes) 1994 and 2000, Chapters 7, will be amended accordingly.
- **Regulation 20:** Amendments regarding fire safety (detection and fighting) on board vessels carrying, or intended to carry vehicles. For new as well as existing ships, numerous amendments will enter into force with regard to fire detection, fire alarm systems, fixed firefighting systems. For details and specifics, reference is made to MSC.555(108) – Amendments to the FSS Code.

SOLAS III / LSA Code:

- Amendments for maintenance, examination, testing, repairs and overhaul of lifeboats, rescue boats, release gear and launching appliances will enter into force, which specify new requirements for examination and checking of ventilation systems for totally enclosed lifeboats by Authorised Service Providers. Reference is made to MSC.535(107) Amendments to the International Live-Saving Appliance (LSA) Code.

SOLAS V

- Mandatory carriage of electronic inclinometers on containerships and bulk carriers. New container vessels and bulk carriers, constructed on or after 1 January 2026 and with 3,000 GT or more, will need to be fitted with electronic inclinometers, linked to the vessels' VDR. Further reference is made to MSC.363(92) – performance standards for electronic inclinometers. This requirement does not retroactively apply to existing ships. Cargo vessels occasionally carrying bulk cargoes or general cargo vessels occasionally carrying containers on deck are exempt.
- **Regulation 21:** under this regulation, all ships must carry an up-to-date hard copy of the International Aeronautical and Maritime Search and Rescue (IAMSAR) Manual Volume III on board. Amendments to the IAMSAR Manual will give force to, among others, enhanced guidance on Night Search Operations, a new section on Offshore Wind Farms, and expanded guidance on access to and use of flight tracking systems and applications to support situational awareness and search planning. Further reference is made to IMO circular MSC.1/Circ.1686.

- **Regulations 31 and 32** (as well as **MARPOL Protocol I, Article 5**): Mandatory reporting of loss of containers enters into force. The Master of every ship involved in the loss of containers is required to report such loss without delay to the nearest coastal state, to all ships in the vicinity, and to the Flag state. Masters observing containers drifting at sea shall communicate all particulars of their observation to the nearest coastal state and to all ships in the vicinity.

Effective as of 1 July 2026

- Related to **SOLAS II, regulation 3-9:** as per IMO circular MSC.1/Circ.1331/Rev.1, Guidelines for the Construction, Installation, Maintenance and Inspection/Survey of Means of Embarkation and Disembarkation are revised, which amongst others involves the application of fixed side nets to accommodation ladders – which in some cases may replace safety nets – and the mandatory use of life jackets and safety harnesses by crew members engaged in rigging the accommodation ladder.

International Code for Ships Operating in Polar Waters (Polar Code)

Amendments to the Polar Code, adopted in 2023, will go into effect on 1 January 2026 and will introduce new safety requirements for certain non-SOLAS ships operating in polar waters. The new rules apply to fishing vessels of 24 m or more, pleasure yachts of 300 GT or more not engaged in trade, and cargo ships between 300 and 500 GT.

Key changes

These include mandatory requirements for up-to-date information on ice conditions, updated navigation equipment, and specific voyage planning details.

New requirements

Vessels in the above categories will need to meet new requirements for safety of navigation and voyage planning, such as:

- Having the ability to receive up-to-date information, including ice information for safe navigation.
- Ensuring that navigational equipment and systems function correctly under expected polar conditions.
- Having the ability to visually detect ice, even in darkness.

Compliance timelines

- For new vessels: ships constructed on or after 1 January 2026 must comply with the new requirements as soon as they begin operating in polar waters.
- For existing vessels: ships constructed before 1 January 2026 have time until 1 January 2027 to comply with the new requirements.

International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW Convention)

Effective as of 1 January 2026

The IMO approved amendments to the STCW Code (Resolution MSC.560(108)) in order to tackle violence, bullying and harassment within the maritime industry. Seafarers will have to undertake specific training in order to develop a mandatory competence in personal safety and social responsibility. This concerns the prevention of and response to violence and harassment, including sexual harassment, bullying and sexual assault.

Please do not hesitate to contact our Loss Prevention Services team at LPS@msigspecialtymarine.com in case of any questions or comments.

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