



EU ETS & FuelEU Maritime

A 2026 Compliance Calendar for Shipowners

Prepared by Ortech Marine

Your Green Solution Partner

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Why this matters

In 2024, shipping joined the EU Emissions Trading System. In 2025, FuelEU Maritime began regulating the carbon intensity of the fuels you burn. Together, these two regulations reshape the cost calculus for every vessel calling at a European port — and they're only going to get tighter through 2030 and beyond.

This calendar is a practical reference document for shipowners, fleet managers and Designated Persons Ashore navigating the year ahead. It is not legal advice — it is a working calendar showing what's due when, what mistakes commonly hurt owners, and where the levers are to reduce exposure.

Use it as a checklist. Print it. Share it internally. Come back to it when the next deadline approaches. When you're ready to model your specific exposure, run the numbers in the EU ETS Cost Estimator at ortechmarine.com.

— *The Ortech Marine engineering team*

Two regulations in 30 seconds

EU ETS Maritime and FuelEU Maritime are different mechanisms targeting different things, but they affect the same vessels and overlap in scope. Understanding both is essential — confusing them is one of the most common mistakes.

MECHANISM 1

EU ETS Maritime

Started: 1 January 2024

Scope: Vessels >5,000 GT

Tool: Cap-and-trade carbon allowances

Coverage: 100% intra-EU voyages, 50% EU-international voyages, 100% at berth

Phase-in: 40% (2024) → 70% (2025) → 100% (2026 onwards)

Allowance: 1 EUA = 1 tonne CO₂

Market price: Approx. €70–90 / tonne (volatile)

Surrender deadline: 30 September each year for the prior year

MECHANISM 2

FuelEU Maritime

Started: 1 January 2025

Scope: Vessels >5,000 GT in EU trade

Tool: GHG intensity target (well-to-wake)

Coverage: Same voyage scope as EU ETS

Targets vs 2020: -2% (2025), -6% (2030), -14.5% (2035), -31% (2040)

Penalty: €2,400 / tonne VLSFO-equivalent for non-compliance

Pooling: Multiple vessels can be pooled for joint compliance

Verification: Annual, by accredited verifier

Note: both regulations apply on top of existing IMO MARPOL Annex VI, EU MRV, and IMO DCS reporting. A vessel in EU trade is now subject to four parallel reporting regimes.

Timeline 2024 – 2030

Both regulations tighten over the rest of the decade. The schedule below shows the milestones that matter for budget and operational planning.

YEAR	EU ETS	FUELEU MARITIME
2024	40% phase-in. First year of obligations.	Not yet in force.
2025	70% phase-in. Surrender 2024 emissions by 30 Sept.	Year 1. Target: -2% GHG intensity vs 2020 baseline.
2026	100% phase-in begins. Surrender 2025 emissions by 30 Sept.	Annual reporting. Target unchanged from 2025.
2027	Full coverage. Surrender 2026 emissions.	Annual reporting.
2028	Full coverage continues.	Annual reporting.
2030	Full coverage continues.	Target tightens to -6% GHG intensity.
2035	Full coverage continues.	Target tightens to -14.5%.
2040	Full coverage continues.	Target tightens to -31%.

2026 calendar, month by month

The dates that matter, in the order they hit. Most are recurring annual obligations — pin them to the fleet calendar now.

JAN	EU ETS 100% phase-in begins. Annual monitoring plan review due. Confirm verifier engagement letter for 2025 emissions report.
FEB	Draft 2025 EU ETS emissions report submitted to verifier. Begin FuelEU Year-1 (2025) compliance review.
MAR	Verified 2025 emissions report due to administering authority by 31 March.
APR - MAY	Q1 emissions tracking review. Mid-year fuel-strategy review — is the planned compliance path still feasible?
JUN	Half-year operational review. Confirm pooling strategy if pooling under FuelEU.
JUL - AUG	Q2 emissions tracking review. Prepare for September surrender.
SEP	EU ETS allowance surrender deadline: 30 September for 2025 emissions. Critical date — missed surrender triggers significant penalty.
OCT	FuelEU compliance review for 2025 — verify well-to-wake intensity calculation.
NOV	Begin planning for 2026 emissions report. Update monitoring plan if needed for fleet changes.
DEC	Annual close. Final operational review. Brief fleet on 2027 obligations.

What you need to do

This is the operational checklist. Each item below should be a named owner and a status, reviewed quarterly.

Monitoring & reporting

- Monitoring plan in place, approved by your administering authority, and current with operations.
- Accredited verifier engaged (Normec Verifavia or equivalent). Engagement letter signed before the reporting year begins.
- Onboard data collection systems running: fuel-flow meters, electronic logs, voyage data.
- Crew briefed on reporting expectations. DPA aware of FuelEU + EU ETS overlap.

EU Allowances

- Maritime Operator Holding Account (MOHA) opened with the EU registry.
- Procurement strategy decided: spot, futures, or hold pre-acquired allowances.
- Budget allocated for 2025 emissions surrender (due September 2026).

FuelEU

- GHG intensity baseline calculated for each vessel.
- Pool strategy decided — pooled with sister vessels, third parties, or stand-alone?
- Compliance path documented: alternative fuels, retrofits, onshore power use, or banking.

Communications

- Charterers informed of cost pass-through approach.
- Internal finance aware of the surrender deadline and budget impact.

Six common pitfalls

From conversations with owners and verifiers over the first 18 months of the regime, these are the mistakes that cost the most money.

01

Engaging the verifier too late.

Accredited verifiers are scarce; the major firms book up six months ahead of the reporting season. Engaging in February for a March deadline forces compromise. Engage by November of the reporting year, at the latest.

02

Miscounting EU exposure.

The 50% vs 100% voyage split depends on both end-points being EU ports. A common error is treating any voyage 'into Europe' as 100%, or any voyage 'partly outside' as 50%. The rule is precise — get it wrong and you over- or under-buy allowances by a meaningful margin.

03

Treating FuelEU as a future problem.

FuelEU Maritime started 1 January 2025. Year 1 obligations are real. Many owners are still scoping ETS and have left FuelEU compliance unowned. The €2,400 / tonne penalty is severe.

04

Not pooling when it would help.

FuelEU permits pooling vessels for joint compliance. A mixed fleet (older + newer) can often satisfy the intensity target collectively when individual vessels can't. If you have a fleet of three or more, model pooling explicitly.

05

Drifting from the approved monitoring plan.

Operations evolve — new routes, fuel switches, equipment changes — and the monitoring plan must be updated when they do. Many verifiers will flag discrepancies, and the administering authority can reject reports built on out-of-date plans.

06

Surrender date confusion.

Allowances for 2025 emissions are due to be surrendered by 30 September 2026. Late surrender triggers a penalty of €100 per allowance not surrendered, plus a public-naming penalty. Calendar this deadline at C-suite level.

How to prepare

Compliance is the floor — not the strategy. Owners who treat EU ETS and FuelEU as engineering opportunities rather than tax obligations are already pulling ahead. Below are the five preparation tracks we work through with clients at Ortech Marine.

01 — Fuel-strategy assessment

Honest review of current fuel consumption patterns by voyage type. Where is the 50% / 100% split sitting? What's the marginal cost of each tonne of CO₂ for your operation? This is the foundation for every other decision.

02 — Retrofit modelling

With our partner technology, we model the cost-benefit of specific retrofits: MG Energy Systems lithium-ion batteries (hybrid propulsion, hotel load), Blueday shore-power systems (zero-emission berth operations), Teknoton DFM Marine (continuous fuel monitoring for verification accuracy), Harsonic ultrasonic antifouling (drag reduction → fuel reduction).

03 — Verification partnership

Ortech Marine partners with Normec Verifavia — a UKAS-, COFRAC-, and SAC-accredited verifier — for independent emissions and FuelEU verification. We provide the local liaison, document preparation, and on-vessel inspection coordination.

04 — Compliance documentation

Monitoring plan reviews, MOHA account opening support, internal compliance briefings for fleet management. Not glamorous, but missing any of it triggers the largest avoidable penalties.

05 — Long-horizon fleet planning

FuelEU targets tighten every five years through 2050. The retrofit you choose in 2026 has to perform against 2030 and 2035 targets. We help model the multi-year economics so this year's project doesn't undermine next year's compliance.

Talk to us

Ortech Marine Maintenance S.A is the engineering partner that integrates world-class marine technology into vessels worldwide — from our EuroAsian hub serving the Tuzla and Yalova shipyard regions. When you're ready to model your exposure, plan a retrofit, or engage a verifier, we can help with all three under one engagement.

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ON THE WEB

ortechmarine.com/eua-calculator

Live EU ETS cost estimator

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