



## NEW FuelEU REQUIREMENTS

**AMC NEWS**  
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As part of the 'Fit for 55' climate policy package, the new **FuelEU Maritime** set of requirements will come into force on **1 January 2025**. This new regulation promotes the uptake of renewable and low-carbon fuels for shipping by establishing a target reduction percentage for annual GHG intensity of energy used onboard:

	2025-2029	2030-2034	2035-2039	2040-2044	2045-2049	2050-
Reduction	-2%	-6%	-14.5%	-31%	-62%	-80%
GHGIE (grCO <sub>2e</sub> /MJ)	89.3	85.7	77.9	62.9	34.6	18.2

### Requirements

Applicable to all Cargo Ships and Passenger Vessels above 5000 GT on EU voyages:

- **Preparation of FuelEU Monitoring Plan:** This new Plan should be submitted to the Verifier by **31 August 2024** and should include the methods used to monitor and report on an annual basis the **Well-to-Wake (WtW) GHG intensity of energy** used onboard a ship.
- **Annual Reporting:** Starting from **1 January 2025**, Shipping Companies should collect relevant data (consumption per fuel type, emission factors, etc.) and submit the **aggregated WtW emissions data** to their Verifier by **31 January each year** for the year before.
- **Verification:** The assigned Verifier will assess the FuelEU Monitoring Plan, ensure that monitoring and reporting are performed in accordance with FuelEU requirements, and verify the annual emissions report. The verified emissions data will then be transferred to the **Thetis MRV database (FuelEU module)** and the Administering Authority will determine the applicable **penalty** after banking / borrowing or pooling are declared.
- **FuelEU Penalty:** In the event of a compliance deficit for any vessel, Shipping Companies should pay the respective penalty by **30 June each year**, after which the vessel will be issued with a **FuelEU DoC**.

This new regulation introduces several complexities. Apart from pooling / banking / borrowing, one **important difference to EU ETS** is that the responsible company under FuelEU Maritime **must** be the ISM Company and cannot be the Registered Owner unless the Owner is also the ISM Company.



### Recommendations

Considering the large number of vessels that will need to comply with the new FuelEU requirements by the end of this year, Owners / Operators / Managers are strongly encouraged to:

- Develop their **FuelEU Monitoring Plans** as early as possible.
- Evaluate their **compliance options** (banking / borrowing or pooling, use of biofuels, etc.).
- Incorporate applicable **FuelEU clauses** in their time charter agreements. Similar to **EU ETS**, the '**polluter pays**' principle is adopted by FuelEU Maritime as well, meaning that whoever pays for the fuel is ultimately responsible to cover the cost of any FuelEU penalty.

Having developed over 1500 EU MRV Monitoring Plans for all types of vessels, handling all Verifier platforms and Thetis MRV document uploads, AMC has extensive experience in the field and may assist with:

- **Preparation and submittal / upload of FuelEU Monitoring Plans** and associated supporting documents.
- **Annual / Quarterly Review** of EU MRV / IMO DCS / FuelEU data.

For further information please contact:

Mr. Philip Tschlis  
[p.tschlis@alphamrn.com](mailto:p.tschlis@alphamrn.com)

Mr. George Markomichelakis  
[g.markomichelakis@alphamrn.com](mailto:g.markomichelakis@alphamrn.com)

### Timeline

