



**TECHNICAL CIRCULAR No. 909 of 5<sup>th</sup> February 2026**

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| To        | All Surveyors/Auditors. All flags |
| Title     | <b>Regulatory pressure</b>        |
| Reference | RETROFIT                          |

**REGULATORY PRESSURE**

Still-evolving international and regional regulations are the primary catalysts for increased interest in EETs, alternative fuels and onboard carbon capture and storage (OCCS) systems.

During the 83rd meeting of the Marine Environment Protection Committee (MEPC) in April 2025, the committee approved the IMO Net-zero Framework (NZF), setting emissions limits and GHG pricing for ships over 5,000 gross tonnage (gt).

As these regulations take shape, shipowners are actively trying to benchmark their performance against IMO trajectories and peer vessels. Improving performance on both operational and technical fronts will be crucial for vessels to stay competitive in the evolving industry.

While the NZF aims to promote the use of alternative fuels with much lower GHG intensity on a Wellto-Wake (WtW) basis, several barriers remain that will take time to overcome.

These include the scaling of renewable energy sources for green fuel production, development of storage and bunkering infrastructure, and addressing the higher costs compared to conventional fuels.

These challenges are shifting attention toward EETs, which can bridge the gap to alternative fuels while mitigating the financial impact of compliance penalties and rising fuel costs.

REFERENCE:

- Retrofits for Energy and Emissions Improvement

ATTACHMENTS: No.

Kindest Regards,  
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