БЪЛГАРСКИ КОРАБЕН РЕГИСТЪР
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BULGARIAN REGISTER OF SHIPPING

BRS CIRCULAR

No 06 / 26

Date:	**14.05.2026**	**Fuel EU Maritime Compliance Cycle 2026**
Substitutes	-	
Amendment to	-	
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Notice to: Ship Owners/ Managers/ Operators/ Surveyors/ Auditors

Introduction

This circular is issued to update stakeholders that the **Fuel EU Maritime verification period for the 2025 reporting year** has commenced and outlines the required actions to ensure compliance, including the application of flexibility mechanisms, verification of compliance balances, and issuance of the Fuel EU Document of Compliance.

Who is Responsible for Compliance?

The **company holding the Document of Compliance (DoC) under the ISM Code** is responsible for Fuel EU compliance.

• Liability for penalties arising from non-compliance remains with the DoC holder.

Verification Period – Key Milestones

By 31 March 2026 – Annual Fuel EU Report Recorded:

• The verifier verifies the annual Fuel EU report in THETIS-MRV.
• The report includes the Initial Compliance Balance, before applying a flexibility mechanism.

By 30 April 2026 – Compliance Confirmation Deadline:

• Companies must create a Compliance Balance Report in THETIS, select the compliance mechanism of their preference (pooling, banking, borrowing or penalty) and submit to their verifier for review.
• The verifier must confirm the compliance balance in THETIS.
• Companies must ensure all applied flexibility mechanisms are reviewed and approved.
• Each ship must have a verified compliance balance in THETIS before the end of April.

Fuel EU Document of Compliance (DoC)

A **Fuel EU Document of Compliance (DoC)** is issued for each vessel based on its compliance status:

• Positive or Zero Compliance Balance:
  o The ship may receive a Fuel EU DoC from the verifier once the compliance balance is confirmed.
• Negative Compliance Balance:
  o The administering state calculates the related penalty.
  o The DoC is issued only after any outstanding Fuel EU penalties have been settled.
  o Instructions for the penalty payments will be provided to the Company by each Administering State directly.

Clients should ensure timely coordination with their verifier and administering state to facilitate issuance of the DoC.

Act now

Ship Owners/ Managers/ Operators/ Verifiers are strongly encouraged to take measures to ensure compliance, including:

- **Review Verified Fuel EU Reports (THETIS-MRV)**
  - o Confirm each ship's compliance balance as recorded by the verifier on 31 March.
- **Assess and Decide on Flexibility Mechanisms**
  - o Evaluate the use of banking, borrowing, or pooling, where applicable.
  - o Engage with relevant parties (e.g. pooling partners, pooling verifier) at an early stage.
- **Apply Selected Mechanisms or Accept Penalty**
  - o Ensure any selected flexibility mechanisms are submitted, reviewed, and approved in THETIS-MRV or proceed with Fuel EU penalty payment before 30 April 2026.
- **Finalize Compliance Position**
  - o If flexibility mechanisms are applied or penalties are paid, ensure each vessel achieves a verified compliance balance by 30 April 2026.
- **Complete Any Additional Verification Activities**
  - o Where required, coordinate promptly with the verifier to complete additional verification steps related to flexibility mechanisms.

Important Note: Failure to complete these steps by 30 April may result in penalties and non-compliance reporting.

For further guidance, companies should consult:

https://transport.ec.europa.eu/transport-modes/maritime/decarbonising-maritime-transport-fueleu-maritime_en

https://transport.ec.europa.eu/transport-modes/maritime/decarbonising-maritime-transport-fueleu-maritime/questions-and-answers-regulation-eu-20231805-use-renewable-and-low-carbon-fuels-maritime-transport_en

https://www.emsa.europa.eu/reducing-emissions/webinars_and_tutorials/fueleu-webinars.html