



*California Air Resources Board*

# *Marine Notice 2025-1*



**May 2025**

## **Advisory to Owners or Operators of Ocean-Going Vessels Visiting California Ports**

### **Confirming Allowable Alternative Fuel Use and Compliance with CARB's Ocean-Going Vessel Fuel Regulation<sup>1</sup>**

The California Air Resources Board's (CARB) Ocean-Going Vessel (OGV) Fuel Regulation (Regulation) reduces particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), and sulfur oxide (SO<sub>x</sub>) emissions from OGVs operating within regulated California waters. The purpose of this Marine Notice is to provide guidance on the definition and use of allowable fuels under the Regulation, including compliant marine gas oil (MGO) and marine diesel oil (MDO), as well as regarding exempt alternative fuels. This Marine Notice also confirms allowable pilot fuels and addresses CARB's enforcement practices.

**Disclaimer:** CARB has prepared this Advisory to describe the regulatory requirements in a user-friendly format. Unlike the California OGV Fuel Regulation, this document does not have the force of law. It is not intended to and cannot establish new mandatory requirements beyond those that are already in law, and it does not supplant, replace, or amend any of the legal requirements. Conversely, this document's omission or truncation of legal requirements does not relieve owners or operators of their legal obligation to fully comply with all requirements of the California OGV Fuel Regulation and is not intended as a substitute for reading the laws.

#### **What fuels comply with the Regulation?**

The Regulation requires OGVs to use marine distillate grade fuel, either MGO or MDO, that meets the specifications of the 2005 or 2010 ISO 8217 standards, with a maximum sulfur content of 0.1 percent. This requirement applies to auxiliary diesel and diesel-electric engines, main propulsion diesel engines, and auxiliary boilers on OGVs operating within regulated California waters, i.e., all waters within 24 nautical miles of the California baseline including offshore islands.

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<sup>1</sup> See *Fuel Sulfur and Other Operational Requirements for Ocean-Going Vessels within California Waters and 24 Nautical Miles of the California Baseline*. Title 13, California Code of Regulations (CCR), section 2299.2; and title 17, CCR, section 93118.2.

### **Does the Regulation allow the use of alternative fuels for OGVs, and which alternative fuels are exempt from the regulatory requirements?**

Certain alternative fuels are exempt from the Regulation's requirements. The Regulation defines alternative fuels as natural gas, propane, ethanol, methanol, hydrogen, electricity, or fuel cells, including any mixture composed only of these fuels. OGVs using these fuels within regulated California waters remain in compliance with the Regulation.

### **Does the Regulation allow the use of compliant MDO or MGO fuels as a pilot fuel alongside an alternative fuel used in the main engine?**

The Regulation allows the use of a pilot fuel in conjunction with a primary fuel, provided that both the pilot fuel and primary fuel are allowable fuels under the Regulation. For example, MGO or MDO may be used as a pilot fuel for a vessel operating on an exempt alternative fuel, such as methanol or liquified natural gas.

### **Can a vessel operator use alternative fuels that are not exempt from the Regulation?**

Yes, a vessel operator can use alternative fuels beyond those that are explicitly exempted under the Regulation, if the vessel operator has first applied for and received CARB approval for a research exemption pursuant to 13 CCR 2299.2(c)(6). The Regulation's research exemption pathway allows for the use of non-exempt alternative fuels, where approved by CARB. This includes the use of biodiesel or renewable diesel, as these fuels are not included in the Regulation's list of exempt alternative fuels and may only be used with an approved research exemption. Non-exempt alternative fuels used under an approved research exemption may be used as a primary fuel and/or as a pilot fuel.

### **What version of the ISO 8217 standard applies to compliance under the Regulation?**

The OGV Fuel Regulation expressly incorporates by reference the 2005 and 2010 versions of ISO 8217.<sup>2</sup> These versions of ISO 8217 establish the relevant specifications the MDO/MGO fuel must meet to comply with the OGV Fuel Regulation. CARB incorporated by reference these versions of the ISO 8217 standard in the Regulation, to provide regulatory certainty for stakeholders.

### **What is the research exemption?**

The research exemption, outlined in Subsection (c)(6) of the Regulation, allows vessel operators to use non-exempt alternative fuels, like renewable diesel, for up to three years (with potential for one extension for up to three additional years) while collecting emissions data that furthers CARB's understanding regarding emissions differences across fuels and exhaust control technologies. This research exemption enables vessel operators to work with CARB to provide scientific data on emissions associated with the alternative fuel use, such as NO<sub>x</sub> emissions, which is a key concern in nonattainment areas like the South Coast

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<sup>2</sup> See title 13, CCR, sections 2299.2(d)(18) and (19).

Air Basin. Research exemptions are granted by the Executive Officer for experimental purposes, provided the applicant meets certain requirements specified in the Regulation.

### **How does a vessel operator obtain a research exemption?**

To apply for an exemption to use a non-exempt alternative fuel in regulated California waters, vessel operators must first obtain written approval from CARB's Executive Officer via an Executive Order before entering regulated California waters. In addition, the vessel operator must take all measures available to minimize emissions of diesel PM, NO<sub>x</sub>, and SO<sub>x</sub> to the extent feasible during the period in which the temporary research exemption is in effect. The application requires a written request submitted at least 30 days in advance, including fuel specifications, research justification, and project details. Vessel operators are encouraged to submit an application for a research exemption as early as possible to provide adequate time for considering their application and their eligibility for an Executive Order prior to the vessel entering regulated California waters. If the exemption is granted, operators must provide annual progress reports and submit final data before the exemption expires. Please reach out to CARB via the contact information below for more detailed information on how to obtain a research exemption.

### **Is CARB prohibiting OGVs powered by exempt alternative fuels from entering regulated California waters?**

CARB does not turn vessels away from regulated California waters. However, if a vessel is found by CARB enforcement staff to be operating in regulated California waters without using a compliant distillate or exempt alternative fuel, CARB can bring enforcement action against the violating party under the OGV Fuel Regulation if the vessel is not operating under a CARB-approved research exemption.

### **How Can I Get More Information?**

Information on California's OGV Fuel Regulation can be found at:

<https://ww2.arb.ca.gov/our-work/programs/ocean-going-vessel-fuel-regulation> or by contacting the OGV Fuel team at [ogvfuelrule@arb.ca.gov](mailto:ogvfuelrule@arb.ca.gov).