

March 10, 2026

Michael R. Morgan
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Dear Michael Morgan:

The California Air Resources Board (CARB) staff has reviewed Disney Cruise Line’s request for exemption from the “Fuel Sulfur and Other Operational Requirements for Ocean-Going Vessels Within California Waters and 24 Nautical Miles of the California Baseline” Regulation (referred to as the Ocean-Going Vessel (OGV) Fuel Regulation) to permit emissions testing by the University of California at Riverside (UCR) on the cruise vessel Disney Wonder.

The primary objective of this testing is to perform emissions testing to better characterize off-cycle (low load) emissions from a pre-Tier OGV and to evaluate how emissions change when the vessel operates on a renewable diesel blend (99% renewable diesel), specifically Hydrotreated Vegetable Oil (HVO), compared with CARB-compliant (0.1% sulfur distillate fuel) marine gas oil (MGO).

CARB has approved the request for a temporary experimental or research exemption from the OGV Fuel Regulation as documented in the enclosed Executive Order.

The approved project includes testing emissions from the main propulsion engines and auxiliary boilers under various operating conditions, utilizing MGO and HVO fuels. The exemption applies to the fuel requirements under 13 CCR, section 2299.2(c)(6), and title 17 CCR 93118.2(c)(6), subject to the conditions specified in Executive Order G-26-040. The exemption covers the main engines and auxiliary boilers listed in Table 1.

Table 1. Vessel and Engine Information

Owner/ Operator	Vessel Name	IMO #	Engine Make/Model	Number of Engines/boilers
Disney Cruise Line	Disney Wonder	9126819	Sulzer / Wartsila/16 ZAV 40S	5 (Main)
			Aalborg AQ9	2 (Aux boilers)

Enclosed is Executive Order G-26-040 granting the OGV Fuel Regulation exemptions for the vessel and engines/boilers identified above and specifying the conditions under which the vessel may operate while in Regulated California Waters. Testing is anticipated to

commence in April 2026 on the Disney Wonder during a voyage departing from the Port of San Diego and sailing to and from Ensenada, Mexico and is expected to occur over a period for up to 2 weeks. The schedule may be adjusted based on vessel availability but any changes to the testing timeframe must receive prior approval from CARB via email.

Please note that the exemption applies only to the extent necessary as directly required by the fuel-switching and emissions testing needs of the approved test protocol as determined by UCR and approved by CARB staff. The Disney Wonder should take all feasible measures to minimize the emissions from testing operations which include but are not limited to, avoiding the unnecessary operation of the engine on non-compliant fuel and connecting to shore-side power when able.

If you have any questions or comments, please contact Elizabeth Melgoza, Staff Air Pollution Specialist, at elizabeth.melgoza@arb.ca.gov.

Sincerely,



Bonnie Soriano, Branch Chief, Freight Activity Branch

cc: Kent Johnson, Ph.D., Principal Investigator, Center for Environmental Research and Technology, College of Engineering, University of California Riverside, kjohnson@cert.ucr.edu

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