
INTRODUCTION

The present report focuses on the topics of maritime safety and security, while also providing an update on climate and decarbonisation.

The first article summarises recent relevant studies published by EMSA on the topic of maritime safety. One study is about the safety of ammonia as marine fuel and the other report is about safe transport of battery-electric vehicles. The article also recalls EMSA's new mandate.

The second article describes recent incidents related to sub-sea infrastructure in European waters and it sheds light on infrastructure security in general. It then explains that a number of countries are stepping up their action against the Russian shadow-fleet, which is often at the origin of infrastructure-incidents.

The third article gives first-hand information on the European Union's reaction to the failure of adopting the IMO's Net-Zero-Framework at the last MEPC.

The last article of this edition presents Frontex latest statistics on irregular border crossings, with a focus on the EU's sea borders.

EMSA publishes two reports on maritime safety

The European Maritime Safety Agency, whose new [mandate](#)¹ has been recently published in the EU's Official Journal has released two relevant reports on maritime safety.

The first report relates to the safety of ammonia. It is the final report of a [series of studies](#)² on the safety of ammonia as a marine fuel. The report among others highlights that the "*application (of ammonia) as a marine fuel remains largely uncharted*". While the study sees potential for ammonia as a shipping fuel in the long run, it also points out that "*its adoption introduces substantial safety and operational challenges, including toxicity, corrosiveness, and the need for specialised fuel systems and engine designs*." Also, the "*safe and effective integration of ammonia into marine propulsion systems*" can only be successful through "*robust safety protocols, regulatory frameworks, and crew training*", the study finds.

The second [report](#)³ is about the safe transportation of Alternative Fuels road Vehicles on ro-ro vessels. The report, which is the first of a series, has been carried out by the RISE Research Institutes of Sweden (RISE) and Bureau Veritas Marine & Offshore (BV). The aim of the study is to provide scientific and technical knowledge on the fire safety of Alternative Fuel Vehicles (AFVs) onboard ships. It is also meant to provide recommendations for further industry guidance and input to the development of relevant instruments at the International Maritime Organization (IMO) level. The report points out that as the number of AFVs increases, there is a growing need of understanding and tackling the challenges of safe transport of the vehicles, where ro-ro ships are an important component.

In the wake of new cable incidents in Baltic Sea several countries toughen their approach towards the Russian shadow fleet

In recent weeks, two more suspicious damages of subsea cables were reported in the Baltic Sea Basin. Since Russia's invasion of Ukraine, such incidents have been multiplying as Russia uses the destruction of electricity and communications cables as well as pipelines as part of its hybrid warfare against NATO and the EU.

One incident at the end of December was reported among others by news outlet [Politico](#)⁴. It involves the Fitburg, a cargo ship sailing under the flag of Saint Vincent and the Grenadines. The suspected

¹ See revised EMSA Regulation: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202502434

² <https://emsa.europa.eu/safety-of-alternative-fuels/ammonia.html>

³ <https://emsa.europa.eu/newsroom/latest-news/item/5614-safe-transport-of-afvs-on-ro-ro-ships-study-published.html>

⁴ <https://www.politico.eu/article/7709793/>

vessel departed from St. Petersburg and was on the way to Israel with crew members from Azerbaijan, Georgia, Kazakhstan and Russia. The ship is suspected of having caused cable damage on 31 December in Estonia's exclusive economic zone by deliberately dragging its anchor. A few hours later, the Finnish coast guard caught the vessel in Finnish waters and the crew was arrested, according to German media [Tagesschau](https://www.tagesschau.de/ausland/europa/ostsee-unterseekabel-ermittlung-100.html)⁵. The crew is suspected of aggravated disruption of telecommunications and also aggravated sabotage and attempted aggravated sabotage. In early January, a sub-sea communications cable was reportedly damaged off the Latvian coast, according to [news reports](https://www.reuters.com/business/media-telecom/latvia-pm-says-baltic-sea-optical-cable-has-been-damaged-2026-01-04/)⁶. The vessel, which is suspected of having caused the damage, is mooring at the Latvian port of Liepaja and the authorities explained the crew seemed prepared to cooperate so that there was no need to detain the vessel.

In the meantime, the European Commission has published a [reply](https://www.europarl.europa.eu/doceo/document/E-10-2025-004479-ASW_EN.html)⁷ to a written [question](https://www.europarl.europa.eu/doceo/document/E-10-2025-004479_EN.html)⁸ on the topic of cable damages submitted by a Member of the European Parliament from the centrist Renew group. The question relates to the suggestion to create a European reserve fleet for repairing subsea power cables, an idea that had been floated by the European Commission in its [Action Plan](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025JC0009)⁹ on cable security from last February. While the European Commission outlines a few ideas on how to improve cable security, it is evasive on the topic of a dedicated repair fleet.

Related to the cable incidents reported above, several EU and NATO member states are reported to step up their response to the Russian shadow fleet, which is suspected of often being involved in these incidents. According to a [news report](https://www.politico.eu/article/uk-work-europe-vladimir-putin-shadow-fleet-forces-vessels/)¹⁰ by Politico, the UK is *"ready to work with its European allies to intercept vessels in Russia's shadow fleet."* On a visit to Finland, British minister of foreign affairs Yvette Cooper said Britain was prepared to work with its allies on enforcement against ships suspected of carrying sanctioned oil or damaging undersea infrastructure. While she remained vague as to what actions would be taken exactly, experts think the more robust approach could involve boarding shadow fleet vessels and seizing their cargo. The minister also praised the work by Finland, a country with first-hand experience and exposure to the shadow fleet.

In the meantime, German authorities have reportedly also toughened their stance against the Russian shadow fleet. According to [national media](https://www.tagesschau.de/investigativ/ndr-wdr/schattenflotte-vorgehen-100.html)¹¹ the Federal Police has recently refused the passage of several shadow fleet vessels through German coastal waters.

The stricter approach against shadow fleet vessels is also a consequence of a change of interpretation of international law. While UNCLOS in principle grants all vessels innocent passage, this does not apply if the vessels have no or a false flag or if the purpose of their passage is obviously not peaceful.

⁵ <https://www.tagesschau.de/ausland/europa/ostsee-unterseekabel-ermittlung-100.html>

⁶ <https://www.reuters.com/business/media-telecom/latvia-pm-says-baltic-sea-optical-cable-has-been-damaged-2026-01-04/>

⁷ https://www.europarl.europa.eu/doceo/document/E-10-2025-004479-ASW_EN.html

⁸ https://www.europarl.europa.eu/doceo/document/E-10-2025-004479_EN.html

⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52025JC0009>

¹⁰ <https://www.politico.eu/article/uk-work-europe-vladimir-putin-shadow-fleet-forces-vessels/>

¹¹ <https://www.tagesschau.de/investigativ/ndr-wdr/schattenflotte-vorgehen-100.html>

EU in the process of redefining its stance on IMO Net-Zero framework

After the postponement of the vote on the NZF at IMO MEPC in October, the EU is still in the process of assessing possible steps ahead. At a meeting with the European Commissioner for Sustainable Transport and Tourism, Apostolos Tzitzikostas that ADS Insight had the opportunity to take part in, the Commissioner explained the EU still is somewhat "*traumatised by what happened in October last year*" at the IMO. We understand that some EU Member States are still rather upset with Cyprus and Greece for stepping away from the EU line on this and it seems that the key priority for the European Commission is to establish EU unity. Numerous internal Commission discussions are taking place on the issue, with the goal to find a solution going forward. The fact that Greece is now working with Saudi Arabia on a joint submission on the NZF, as reported by [Greek media](#)¹² may complicate things further.

Commissioner Tzitzikostas went as far as saying that he is "*not very optimistic*" on the IMO / NZF issue, since the US is likely to continue pressuring countries to reject any form of global solution. That said, he wants the EU to "*stick to the plan*", keep supporting countries and try to get them (back) onboard. He underlined the importance of playing it carefully, in light of the volatile geopolitical situation that we know.

Frontex publishes numbers on irregular migration

Frontex, the European Border and Coast Guard Agency, has [released](#)¹³ its latest statistics on irregular border crossings in 2025. The trend is downward and Frontex appears confident that with the entry into force of the European Pact for Migration and Asylum as well as the Entry/Exit System and the European Travel Information and Authorisation System (ETIAS), the tendency will remain similar in 2026. The [European Pact for Migration](#)¹⁴ will significantly restrict the EU's migration policy, among others by facilitating returns to third countries while the [Entry/Exit](#)¹⁵ and [ETIAS](#)¹⁶ systems will help keep track of potentially illegal border crossings.

When it comes to maritime borders, the Central Mediterranean remained the most used migration route into the EU in 2025. Frontex reports similar detection levels as in 2024. On the Eastern Mediterranean route, detections fell overall, continuing a downward trend. The Western Africa route

¹² <https://ypen.gov.gr/papastavrou-gia-riant-i-ellada-einai-mia-foni-realismou-stin-evropi-oston-afora-tin-energeia/>

¹³ <https://www.frontex.europa.eu/media-centre/news/news-release/frontex-irregular-border-crossings-down-26-in-2025-europe-must-stay-prepared-lyKpVb>

¹⁴ <https://www.consilium.europa.eu/en/policies/eu-migration-asylum-reform-pact/>

¹⁵ <https://travel-europe.europa.eu/ees/what-is-the-ees>

¹⁶ <https://travel-europe.europa.eu/etias/about-etias/what-is-etias>

saw the steepest declines, with detections down by around two-thirds, driven by sharp drops in departures from Mauritania, Morocco and Senegal. Frontex also reports that *“attempts detected on exit towards the UK across the Channel, which include both those who reached the UK and those prevented from leaving, continued roughly in line with 2024.”*

Despite the overall decrease in irregular migration, including via sea, the Agency stresses that the risks related to irregular migration via sea remain significant, as criminal smuggling gangs often force people to attempt dangerous crossings in overcrowded and unseaworthy boats. Frontex also quotes estimations from the International Organization for Migration, according to which at least 1 878 people lost their lives in the Mediterranean in 2025, compared with 2 573 the previous year. Frontex points out that its planes and vessels support national authorities by detecting boats in danger and sharing this information in real time, helping improve situational awareness, and search and rescue preparedness.