

# Unified Interpretations for MARPOL ANNEX VI

## Amended Guidance

Guidance for the Survey and Construction of Steel Ships Part D  
Guidance for Marine Pollution Prevention Systems  
Guidance for High Speed Craft  
Guidance for the Survey and Construction of Inland Waterway Ships  
Guidance for Marine Engine Emission Verification

## Reasons for Amendment

In October 2012, the IMO Marine Environment Protection Committee (MEPC) approved some unified interpretations for MAPOL ANNEX VI as MEPC.1/Circ.795 and has continued to revise them ever since. At MEPC74 held in May 2019, new unified interpretations for the recording requirements regarding NOx emissions, the sulphur content of fuel oil, shipboard incinerators, etc., which are specified in ANNEX VI, were suggested and subsequently approved as MEPC.1/Circ.795/Rev.4.

In addition, with respect to the enhanced regulations on sulphur content of fuel oil which are scheduled to enter into force from 1 January 2020, a guideline which helps ensure the consistent implementation of sulphur limits was also adopted as MEPC.320(74) at MEPC74. This guideline specifies that differences in the properties (e.g. viscosity, cold flow property) of new 0.50% m/m limit fuel oils and conventional fuel oils should be considered in order to prevent troubles such as fuel oil leaks, filter plugging, etc.

Accordingly, all relevant requirements were amended based upon the above IMO unified interpretations and guideline.

## Outline of Amendment

- (1) Specified that fuel oil properties are to be considered in cases where fuel oils with a sulphur content of 0.50% m/m or below are used.
- (2) Clarified the recording requirements related to the tier and on/off status of marine diesel engines upon entry into and exit from emission control areas.
- (3) Specified that the prohibition on carriage of non-compliant fuel oil applies even to fuel oils used for emergency equipment.
- (4) Clarified, regarding the requirements of shipboard incinerators complying with MEPC.76(40), the definitions of “feeding of waste” and “temperature in combustion space”.

## Amended Requirements

Guidance for the Survey and Construction of Steel Ships  
Part D: D1.3.1  
Guidance for Marine Pollution Prevention Systems  
Part 8: 1.2.2, 2.1.4, 2.4,  
Guidance for High Speed Craft  
Part 9: 1.2.1  
Guidance for the Survey and Construction of Inland Waterway Ships  
Part 7: 1.3.1  
Guidance for Marine Engine Emission Verification  
2.2.2