



RUSSIAN MARITIME REGISTER OF SHIPPING

CIRCULAR LETTER

No. 313-04-1319c

dated 31.01.2020

Re:

amendments to the Guidelines on the Application of Provisions of the International Convention MARPOL 73/78, 2020, ND No. 2-030101-035-E

Item(s) of supervision:

ships under construction and in service

Entry-into-force date:

refer to Appendix 1

~~Valid till:~~

~~Validity period extended till:~~

~~Cancels / amends / adds Circular Letter No.~~

~~dated~~

Number of pages:

1+8

Appendices:

Appendix 1: information on amendments introduced by the Circular Letter

Appendix 2: text of amendments to Part I "Regulations for Technical Supervision", Part II "Ship's Construction, Equipment and Arrangements for the Prevention of Pollution by Oil", Part IV "Ship's Equipment and Arrangements for the Prevention of Pollution by Sewage" and Part VI "Ship's Equipment and Arrangements for the Prevention of Air Pollution"

Director General

Konstantin G. Palnikov

Text of CL:

We hereby inform that in connection with adoption of IMO resolutions MEPC.301(72), MEPC.305(73), MEPC.309(73), MEPC.312(74), MEPC.314(74), MEPC.316(74), MEPC.317(74), MEPC.322(74) and IMO circular MEPC.1/Circ.795/Rev.4, the Guidelines on the Application of Provisions of the International Convention MARPOL 73/78 shall be amended as specified in Appendices to the Circular Letter.

It is necessary to do the following:

1. Bring the content of the Circular Letter to the notice of the RS surveyors, interested organizations and persons in the area of the RS Branch Offices' activity.
2. Apply the provisions of the Circular Letter during survey of ships under construction and in service in accordance with the dates specified in Appendix 1.

List of the amended and/or introduced paras/chapters/sections:

Part I: paras 1.4.1, 1.1.5, 1.1.6, 1.2.1, 2.1.7, 2.2.1, 3.1.9 and 3.2.3;

Part II: paras 1.1, 3.1.10 and 5.2.1;

Part IV: para 3.5.3;

Part VI: paras 1.2.1, 2.1.6, 2.2.3, 2.2.5, 2.2.9, 2.3.1, 2.3.2, 2.5.4, 2.6.3, 2.6.12, 2.6.13 and 2.6.15

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**Information on amendments introduced by the Circular Letter
(for inclusion in the Revision History to the RS Publication)**

| Nos. | Amended paras/chapters/sections | Information on amendments | Number and date of the Circular Letter | Entry-into-force date |
|------|---------------------------------|--|--|-----------------------|
| 1 | Part I, para 1.1.4 | Text duplicating the provisions of this paragraph has been deleted | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 2 | Part I, para 1.1.5 | Para has been supplemented by the reference to IMO resolution MEPC.277(70) | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 3 | Part I, para 1.1.6 | Para has been supplemented by the reference to IMO resolution MEPC.305(73) | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 4 | Part I, para 1.2.1 | New definition "Electronic record book" has been introduced, considering IMO resolutions MEPC.314(74), MEPC.316(74) and MEPC.317(74) | 313-04-1319c of 31.01.2020 | 01.10.2020 |
| 5 | Part I, para 2.1.7 | Para has been supplemented by the reference to IMO resolution MEPC.309(73) | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 6 | Part I, Table 2.2.1 | Requirements have been specified considering IMO resolution MEPC.291(71) | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 7 | Part I, para 3.1.9 | Requirements have been specified considering IMO resolution MEPC.316(74) | 313-04-1319c of 31.01.2020 | 01.10.2020 |
| 8 | Part I, para 3.2.3 | Requirements have been specified considering IMO resolution MEPC.317(74) | 313-04-1319c of 31.01.2020 | 01.10.2020 |
| 9 | Part II, para 1.1 | Definition "Slop tank" has been specified | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 10 | Part II, para 3.1.10 | Para has been deleted | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 11 | Part II, para 5.2.1 | Reference to IMO circular MEPC.1/Circ.673 has been replaced by reference to IMO circular MEPC.1/Circ.643 | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 12 | Part IV, para 3.5.3 | Requirements have been specified in accordance with regulation 11.1.1 of Annex IV to MARPOL 73/78 | 313-04-1319c of 31.01.2020 | 31.01.2020 |

| Nos. | Amended paras/chapters/sections | Information on amendments | Number and date of the Circular Letter | Entry-into-force date |
|------|---------------------------------|---|--|-----------------------|
| 13 | Part VI, para 1.2.1 | Definition "Cargo ship having ice-breaking capability" has been amended considering IMO resolution MEPC.316(74). Definition "SO _x emission control area" has been replaced by the definition "Emission control area" considering regulation 2.8 of Annex IV to MARPOL 73/78. New definition "Polar Code" has been introduced considering IMO resolution MEPC.316(74) | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 14 | Part VI, para 2.1.6 | Requirements have been specified considering IMO resolution MEPC.316(74) | 313-04-1319c of 31.01.2020 | 01.10.2020 |
| 15 | Part VI, para 2.2.3 | Requirements have been specified considering IMO circular MEPC.1/Circ.795/Rev4 | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 16 | Part VI, para 2.2.5 | Requirements for marine diesel engines have been specified in accordance with regulation 3.3.1.4 of Annex IV to MARPOL 73/78 | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 17 | Part VI, para 2.2.9 | Requirements have been specified considering IMO resolution MEPC.316(74) | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 18 | Para VI, para 2.3.1 | Requirements have been specified considering IMO resolution MEPC.305(73) | 313-04-1319c of 31.01.2020 | 01.03.2020 |
| 19 | Part VI, para 2.3.2 | Requirements have been specified considering IMO resolution MEPC.305(73) | 313-04-1319c of 31.01.2020 | 01.03.2020 |
| 20 | Part VI, para 2.5.4 | Requirements have been specified considering IMO circular MEPC.1/Circ.795/Rev4 | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 21 | Part VI, para 2.6.3 | Requirements have been specified considering IMO resolutions MEPC.316(74) and MEPC.322(74) | 313-04-1319c of 31.01.2020 | 01.10.2020 |
| 22 | Part VI, para 2.6.12 | Requirements have been specified considering IMO circular MEPC.1/Circ.795/Rev4 | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 23 | Part VI, para 2.6.13 | Requirements have been specified considering IMO circular MEPC.1/Circ.795/Rev4 | 313-04-1319c of 31.01.2020 | 31.01.2020 |
| 24 | Part VI, para 2.6.15 | Requirements have been specified considering IMO circular MEPC.1/Circ.795/Rev4 | 313-04-1319c of 31.01.2020 | 31.01.2020 |

**GUIDELINES ON THE APPLICATION OF PROVISIONS OF THE INTERNATIONAL
CONVENTION MARPOL 73/78, 2020,**

ND No. 2-030101-035-E

PART I. REGULATIONS FOR TECHNICAL SUPERVISIONS

1 GENERAL

1.1 SCOPE OF APPLICATION

1 **Para 1.1.4** is replaced by the following text:

"1.1.4 The requirements of Annex IV to MARPOL 73/78, as amended by IMO resolution MEPC.265(68) (Part IV "Ship's Equipment and Arrangements for the Prevention of Pollution by Sewage") apply to the following ships engaged in international voyages as specified in regulation 2 of Annex IV to MARPOL 73/78, as amended by IMO resolution MEPC.265(68):

.1 new ships of 400 gross tonnage and above;

.2 new ships of less than 400 gross tonnage, which are certified to carry more than 15 persons;

.3 existing ships of 400 gross tonnage and above, in 5 years after the date of entry into force of Annex IV to MARPOL 73/78, as amended by IMO resolution MEPC.265(68), i.e. after 27 September 2008;

.4 existing ships of less than 400 gross tonnage, which are certified to carry more than 15 persons, in 5 years after the date of entry into force of Annex IV to MARPOL 73/78, as amended by IMO resolution MEPC.265(68), i.e. after 27 September 2008.

The Administration shall ensure that the existing ships specified in 1.1.4.3 and 1.1.4.4, the keels of which were laid or which were at a similar stage of construction before 2 October 1983 are equipped, as far as practicable, to meet the requirements for sewage discharge in accordance with regulation 11 of Annex IV to MARPOL 73/78, as amended by IMO resolution MEPC.265(68)."

2 **Para 1.1.5** is replaced by the following text:

"1.1.5 The requirements of Annex V to MARPOL 73/78, as amended by IMO resolutions MEPC.265(68) and MEPC.277(70) (Part V "Ship's Equipment and Arrangements for the Prevention of Pollution by Garbage"), unless expressly provided otherwise, apply to all ships as specified in regulation 2 of Annex V to MARPOL 73/78."

3 **Para 1.1.6** is replaced by the following text:

"1.1.6 The requirements of Annex VI to MARPOL 73/78 adopted by IMO resolution MEPC.176(58) (Part VI "Ship's Equipment and Arrangements for the Prevention of Air Pollution") with amendments adopted by IMO resolutions MEPC.203(62), MEPC.251(66), MEPC.278(70), MEPC.286(71) and MEPC.305(73), unless expressly provided otherwise in regulations 3, 5, 6, 13, 15, 16, 18, 19, 20, 21, 22 and 22A of Annex VI to MARPOL 73/78, apply to all ships as specified in regulation 1 of Annex VI to MARPOL 73/78 and to each marine diesel engine with a power output of more than 130 kW as specified in regulation 13 of Annex VI to MARPOL 73/78."

1.2 DEFINITIONS AND EXPLANATIONS

4 **Para 1.2.1** is supplemented by the following new definition:

"Electronic record book means a device or system, approved by the Administration taking into account the provisions of IMO resolution MEPC.312(74), used to electronically record the required entries for discharges, transfers and other operations as required under MARPOL Annexes I, II, V and VI and the NO_x Technical Code in lieu of a hard copy record book.

This definition shall be applied from 1 October 2020 in accordance with IMO resolutions MEPC.314(74), MEPC.316(74) and MEPC.317(74)."

2 SURVEYS

2.1 TYPES OF SURVEYS

5 **Para 2.1.7.** The first paragraph is replaced by the following text:

"**2.1.7** As to the energy efficiency of ships in accordance with the requirements of Chapter 4, Annex VI to MARPOL 73/78, every ship of 400 gross tonnage and above covered by Chapter 4, Annex VI to MARPOL 73/78 shall be subject to the surveys specified below in compliance with IMO resolution MEPC.203(62), taking into consideration the 2014 Guidelines on Survey and Certification of the Energy Efficiency Design Index (EEDI), given in IMO resolution MEPC.254(67), as amended by IMO resolutions MEPC.261(68) and MEPC.309(73):"

2.2 SCOPE OF SURVEYS

6 **Table 2.2.1.** In **para 5.1** the item of survey is replaced by the following text:

"Engines covered by regulation 13 of Annex VI to MARPOL73/78 including engines fitted with the NO_x reducing device, if applicable".

3 TECHNICAL DOCUMENTATION

7 **Para 3.1.9** is replaced by the following text:

".**9**procedure for operations on preparation of the ship's fuel oil system for running on low sulphur fuel oil with sulphur content specified in regulation 14.4 of Annex VI to MARPOL 73/78 prior to entry into the SO_x emission control area, and the relevant ship's log book or electronic record book, approved by the Administration considering provisions of the Guidelines for the Use of Electronic Record Books under MARPOL given in IMO resolution MEPC.312(74), for recording the volume of low sulphur fuel oil in each tank as well as the date time and position of the ship when any fuel-oil-change-over operation is completed prior to the entry into an emission control area or commenced after exit from such an area;".

8 **Para 3.2.3** is replaced by the following text:

".**3**record books of engines parameters or electronic record books covered by the requirements of the NO_x Technical Code".

**PART II. SHIP'S CONSTRUCTION, EQUIPMENT AND ARRANGEMENTS
FOR THE PREVENTION OF POLLUTION BY OIL**

1 DEFINITIONS AND EXPLANATIONS

9 **Para 1.1.** Definition "Slop tank" is replaced by the following:

"Slop tank means a tank specifically designated for the collection of tank drainings, tank washings and other oily mixtures."

3 MARPOL 73/78 REQUIREMENTS FOR OIL TANKERS

3.1 SEGREGATED BALLAST TANKS

10 **Para 3.1.10** is deleted.

5 THE 15 PPM BILGE SEPARATORS

5.1 GENERAL

11 **Para 5.2.1.** In the first paragraph, reference to MEPC.1/Circ.673 is replaced by reference to MEPC.1/Circ.643.

**PART IV. SHIP'S EQUIPMENT AND ARRANGEMENTS FOR THE PREVENTION OF
POLLUTION BY SEWAGE**

3 EQUIPMENT FOR SEWAGE STORAGE, TREATMENT AND DISCHARGE

3.5 ARRANGEMENTS FOR SEWAGE DISCHARGE

12 **Para 3.5.3.** The first paragraph in is replaced by the following text:

"3.5.3 To provide the discharge of untreated sewage from the ship's holding tanks within the areas where the discharge is permitted in accordance with regulation 11.1.1 of Annex IV to MARPOL 73/78, the calculation of the rate of discharge shall be available on board the ship. This calculation shall be made on the basis of standards given in IMO resolution MEPC.157(55). The rate of discharge shall be approved by the Administration or by the Register on its behalf."

**PART VI. SHIP'S EQUIPMENT AND ARRANGEMENTS FOR THE PREVENTION
OF AIR POLLUTION**

1 GENERAL

1.2 DEFINITIONS AND EXPLANATIONS

13 **Para 1.2.1.** The definition "Cargo ship having ice-breaking capability" is supplemented by the following new paragraph:

"This definition shall not apply from 1 October 2020."

The definition "SO_x emission control area" is replaced by the following text:

"Emission control area means an area where the adoption of special mandatory measures for emissions from ships is required to prevent, reduce and control air pollution from NO_x or SO_x and particulate matter and their attendant adverse impacts on human health and the environment. Emission control areas shall include those listed in regulations 13 and 14 of Annex VI to MARPOL 73/78."

After the definition "Ozone depleting substances", the following new definition "Polar Code" is introduced:

"Polar Code means the International Code for Ships Operating in Polar Waters adopted by IMO resolutions MSC.385(94) and MEPC.264(68)."

2 CONTROL OF EMISSIONS FROM SHIPS

2.1 OZONE DEPLETING SUBSTANCES

14 **Para 2.1.6.** The first paragraph is replaced by the following text:

"2.1.6 The Ozone Depleting Substances Record Book may form part of an existing log book or electronic record book as approved by the Administration. An existing electronic recording system (if applicable) shall be considered an electronic record book, provided the electronic recording system is approved by the Administration in accordance with the provisions of IMO resolution MEPC.312(74) on or before the first IAPP Certificate renewal survey carried out on or after 1 October 2020, but not later than 1 October 2025."

2.2 NITROGEN OXIDES (NO_x)

15 **Para 2.2.3** is replaced by the following text:

"2.2.3 For a major conversion involving the replacement of a marine diesel engine with a non-identical marine diesel engine, or the installation of an additional marine diesel engine, the standards in regulation 13 of Annex VI to MARPOL 73/78 and in force at the time of replacement or addition of the engine shall apply.

In accordance with IACS UI MPC98 and IMO circular MEPC.1/Circ.795/Rev.4, the term "time of the replacement or addition of the engine" shall be taken as the date of:

1 the contractual delivery date of the engine to the ship in the event the engine is fitted on board and tested for its intended purpose within six (6) months after the date specified in sub-paragraphs of regulation 13.5.1.2, Annex VI to MARPOL 73/78 as applicable; or

.2 in the absence of a contractual delivery date, the actual delivery date of the engine to the ship in the event the engine is fitted on board and tested for its intended purpose within six (6) months after the date specified in sub-paragraphs of regulation 13.5.1.2, Annex VI to MARPOL 73/78, provided that the date is confirmed by a delivery receipt; or

.3 the actual date that the engine is tested on board for its intended purpose in the event the engine is fitted on board and tested for its intended purpose on or after six (6) months from the date specified in sub-paragraphs of regulation 13.5.1.2, Annex VI to MARPOL 73/78 as applicable.

The above dates are the dates of major conversion and shall be entered in the Supplement to IAPP Certificate (form 2.4.23) — para 2.2.1, table, item 8.a, line "13.2.1.1 & 13.2.2".

If the engine delivery contract is concluded before the date specified in sub-paragraphs of regulation 13.5.1.2 of Annex VI to MARPOL 73/78, as appropriate, or if, in the absence of a contractual delivery date, the engine is delivered on board (the delivery date is confirmed by a delivery receipt) before that date, but not tested within six (6) months after the date specified

in sub-paragraphs of regulation 13.5.1.2, due to unforeseen circumstances beyond the control of the shipowner, then the "unforeseen delay in delivery" may be considered by the Administration in a manner similar to the provisions of paragraph 4 of the Unified Interpretations to MARPOL 73/78 Annex I.

In the case of replacement engines only (on the dates specified in sub-paragraphs of regulation 13.5.1.2 or in regulation 13.5.1.3 of Annex VI to MARPOL 73/78), if it is not possible for such a replacement engine to meet the standards set forth in regulation 13.5.1.1 of Annex VI to MARPOL 73/78 (Tier III), then that replacement engine shall meet the standards set forth in regulation 13.4 of Annex VI to MARPOL 73/78 (Tier II). The criteria of when it is not possible for replacement engine to meet the standards set forth in regulation 13.5.1.1 of Annex VI to MARPOL 73/78 are given in the 2013 Guidelines as Required by Regulation 13.2.2 of MARPOL Annex VI in Respect of Non-Identical Replacement Engines Not Required to Meet the Tier III limit (refer to IMO resolution MEPC.230(65)). The following criteria may be applied:

.1 a replacement engine of similar rating complying with Tier III is not commercially available; or

.2 the replacement engine, in order to be brought into Tier III compliance, needs to be equipped with a NO_x reducing device which due to:

size cannot be installed in the limited space available on board; or

extensive heat release could have adverse impact on the ships structure, sheeting, and/or equipment whilst additional ventilation and/or insulation of the engine-room/compartment will not be possible;

.3 the replacement engine cannot be installed due to its dimensions and weight, as well as due to the fact that it cannot be integrated with the ship components (drive shafts, reduction gears, propeller shafts, etc.), systems and equipment;

.4 adjustments of the replacement engine, which shall be equipped with the NO_x reducing device, do not allow the joint operation of the engine and this device;

as well as other criteria indicated in IMO Guidelines mentioned above.

For a major conversion involving the replacement of a marine diesel engine with a non-identical marine diesel engine or the installation of an additional marine diesel engine on or after 1 January 2000 but before 1 July 2010 the provisions of IACS UI MPC20 (Rev.1 Apr 2014) shall apply.

To identify whether the engine is an identical engine, the Unified Interpretations according to IMO circular MEPC.1/Circ.795/Rev.4 shall be considered."

16 **Para 2.2.5.** The last paragraph is replaced by the following text:

"marine diesel engines that are solely dedicated to the exploration, exploitation and associated offshore processing of seabed mineral resources."

17 **Para 2.2.9** is replaced by the following text:

"2.2.9 The tier and on/off status of marine diesel engines installed on board a ship to which the EIAPP Certificates have been issued confirming that they are certified to both Tier II and Tier III or that they are certified to Tier III only shall be recorded in such logbook or electronic record book, as prescribed by the Administration, at entry into and exit from a NO_x Tier III emission control area, or when the on/off status changes within such an area, together with the date, time and position of the ship (IMO resolution MEPC.271(69)). When applying this requirement, the Unified Interpretations according to IMO circular MEPC.1/Circ.975/Rev.4 shall be considered."

2.3 SULPHUR OXIDES (SO_x)

18 **Para 2.3.1** is replaced by the following text:

"2.3.1 In accordance with regulation 14.1 of Annex VI to MARPOL 73/78, the sulphur content of any fuel oil used on board ships shall not exceed the limit of 0,50 % m/m on and after 1 January 2020.

From 1 March 2020 the sulphur content of fuel oil used or carried for use on board a ship shall not exceed 0,50 % m/m. Requirement for the prohibition on carriage of non-compliant fuel oil shall be applied to the fuel oil of shipboard equipment used only in emergency situations."

19 **Para 2.3.2** is replaced by the following text:

"**2.3.2** In accordance with regulation 14.4, Annex VI to MARPOL 73/78, while a ship is operating within SO_x emission control area, the sulphur content of fuel oil used on board that ship shall not exceed 0,10 % m/m."

2.5 SHIPBOARD INCINERATION

20 **Para 2.5.4** is replaced by the following text:

"**2.5.4** For continuous-feed incinerators solid waste shall not be fed into the unit when the combustion chamber flue gas outlet temperature is below 850°C. Oil residues generated during normal operation of a ship shall not be regarded as waste in connection with regulation 16 Annex VI to MARPOL 73/78, and can be fed into the unit when the required preheat temperature of 650 °C in the combustion chamber is achieved. Batch loaded incinerators shall be designed so that the temperature in the actual combustion space where the solid waste is combusted shall reach 600 °C within five minutes after start up."

2.6 REGULATIONS ON ENERGY EFFICIENCY FOR SHIPS

21 **Para 2.6.3.** After the fourteenth paragraph, the following new paragraph is introduced:

"From 1 October 2020, the above requirements for EEDI shall not apply to category A ships as defined in the Polar Code, as well as to ships having non-conventional propulsion except for cruise passenger ships and LNG carriers."

22 **Para 2.6.12** is replaced by the following text:

"**2.6.12** Confirmation of compliance with 2.6.11, issued by the Administration, shall be submitted on or before 31 December 2018 and shall be kept on board. Ships that are delivered on or after 1 January 2019 shall keep on board both a SEEMP that is in compliance with 2.6.11 and a document confirming the compliance."

23 **Para 2.6.13** is replaced by the following text:

"**2.6.13** In accordance with IMO resolution MEPC.278(70) "Amendments to MARPOL Annex VI (Data collection system for fuel oil consumption of ships)", from 1 January 2019, every ship of 5000 gross tonnage and above, on which SEEMP is required, shall ensure collecting data on fuel oil consumption, distance travelled over ground and hours underway, using methods and procedures set out in SEEMP. For data relating to boil-off gas (BOG) consumed on board the ship for propulsion or operation is required to be collected and reported as fuel as part of the data collection system for fuel oil consumption of ships."

24 **Para 2.6.15.** The last paragraph is replaced by the following text:

"In the event that the SEEMP is not available on board during the above mentioned surveys, the advice of the Administration concerning the issuance of the IEE Certificate shall be sought in accordance with IMO circular MEPC.1/Circ.795/Rev.4. However, the endorsement or issue of the IAPP Certificate is not impacted by the lack of SEEMP on board."