



# RUSSIAN MARITIME REGISTER OF SHIPPING

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**CIRCULAR LETTER**

**No. 311-05-1955c**

dated 06.07.2023

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Re:

amendments to the Guidelines on the Application of Provisions of the International Convention MARPOL 73/78, 2022, ND No. 2-030101-049-E in connection with adoption by IMO of resolutions MEPC.368(79), MEPC.364(79) and MEPC.365(79) as well as approval by IMO of Unified Interpretations to Annex VI to MARPOL 73/78

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Item(s) of supervision:

ships under construction and in service, technical documentation

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Entry-into-force date:

**From the date of publication**

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

~~dated~~

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Number of pages: 1 + 4

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Appendices:

Appendix 1: information on amendments introduced by the Circular Letter

Appendix 2: text of amendments to Part V "Ship's Equipment and Arrangements for the Prevention of Pollution by Garbage" and Part VI "Ship's Equipment and Arrangements for the Prevention of Air Pollution"

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Director General

Sergey A. Kulikov

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Text of CL:

We hereby inform that in connection with adoption by IMO of resolutions MEPC.368(79), MEPC.364(79), MEPC.365(79) and approval by IMO of Unified Interpretations to Annex VI to MARPOL 73/78 in circular MEPC.1/Circ.795/Rev.7, as well as considering the experience of technical supervision, the Guidelines on the Application of Provisions of the International Convention MARPOL 73/78 shall be amended as specified in the Appendices to the Circular Letter.

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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 from 06.07.2023 during review and approval of the technical documentation on ships and during survey of ships under construction and in service requested from the entry-into-force date of amendments.
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List of the amended and/or introduced paras/chapters/sections:

Part V: paras 2.3.2, 2.4.1 — 2.4.3 and 2.4.6

Part VI: paras 2.2.3, 2.2.6, 2.2.12, 2.2.13, 2.6.3, 2.6.4, 2.6.16, 2.6.23, 2.6.26, 2.6.27.2 and 2.6.29

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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 V, paras 2.3.2, 2.4.1 — 2.4.3	Para has been amended considering IMO resolution MEPC.368(79)	311-05-1955c of 06.07.2023	06.07.2023
2	Part V, paras 2.4.6	Para has been deleted considering IMO resolution MEPC.368(79)	311-05-1955c of 06.07.2023	06.07.2023
3	Part VI, paras 2.2.3, 2.2.6 and 2.2.12	Reference to IMO circular MEPC.1/Circ.795 /Rev.5 has been replaced by the reference to IMO circular MEPC.1/Circ.795/Rev.7	311-05-1955c of 06.07.2023	06.07.2023
4	Part VI, para 2.2.13	New para has been introduced considering IMO circular MEPC.1/Circ.795/Rev.7	311-05-1955c of 06.07.2023	06.07.2023
5	Part VI, para 2.6.3	Reference to IMO resolution MEPC.308(73), as amended, has been replaced by the reference to IMO resolution MEPC.364(79); reference to IMO circular MEPC.1/Circ.795/Rev.7 has been introduced	311-05-1955c of 06.07.2023	06.07.2023
6	Part VI, para 2.6.4	Reference to regulation of Annex VI to MARPOL 73/78 has been specified	311-05-1955c of 06.07.2023	06.07.2023
7	Part VI, para 2.6.16	Reference to IMO resolution MEPC.282(70) has been replaced by the reference to IMO resolution MEPC.346(78)	311-05-1955c of 06.07.2023	06.07.2023
8	Part VI, para 2.6.23	Reference to IMO circular IMO MEPC.1/Circ.795/Rev.7 has been introduced	311-05-1955c of 06.07.2023	06.07.2023
9	Part VI, para 2.6.26	Reference to IMO resolution MEPC.254(67), as amended, has been replaced by the reference to IMO resolution MEPC.365(79)	311-05-1955c of 06.07.2023	06.07.2023
10	Part VI, para 2.6.27.2	Reference to IMO resolution MEPC.308(73), as amended, has been replaced by the reference to IMO resolution MEPC.364(79)	311-05-1955c of 06.07.2023	06.07.2023
11	Part VI, para 2.6.29	Reference to IACS PR38 (Rev.3 Jan 2021) has been replaced by the reference to IACS PR No. 38 (Rev.4 Feb 2023)	311-05-1955c of 06.07.2023	06.07.2023

## **GUIDELINES ON THE APPLICATION OF PROVISIONS OF THE INTERNATIONAL CONVENTION MARPOL 73/78, 2022**

**ND No. 2-030101-049-E**

### **PART V. SHIP'S EQUIPMENT AND ARRANGEMENTS FOR THE PREVENTION OF POLLUTION BY GARBAGE**

#### **2. EQUIPMENT AND DEVICES FOR GARBAGE COLLECTION, STORAGE AND PROCESSING**

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

**"2.3.2** Garbage compactors shall be installed in a compartment with adequate room for operating and maintaining the unit, and for storing garbage to be processed. The space shall have fresh water wash down service, coamings, deck drains and adequate ventilation."

2 **Paras 2.4.1, 2.4.2 and 2.4.3** are replaced by the following text:

**"2.4.1** The incinerator installed on board the ship shall comply with the requirements of IMO resolutions MEPC.59(33) or MEPC.76(40) or MEPC.244(66), as amended by IMO resolution MEPC.368(79), whichever is applicable.

**2.4.2** Incinerators subjected to type approval on or after 4 April 2014 shall be tested in accordance with IMO resolution MEPC.244(66), as amended by IMO resolution MEPC.368(79).

**2.4.3** In accordance with regulation 16 of Annex VI to MARPOL 73/78, the incinerators set forth below shall be manufactured in compliance with the requirements of IMO resolutions MEPC.76(40) or MEPC.244(66), as amended by IMO resolution MEPC.368(79), whichever is applicable, and shall have type approval of the Administration:

incinerators installed in ships, the keels of which were laid on or after 1 January 2000;  
new incinerators installed in existing ships, the date of contract for delivery of which is on or after 1 January 2000.

Utilization in ships of the abovementioned incinerators having no type approval in accordance with the requirements in IMO resolutions MEPC.76(40) or MEPC.244(66), as amended by IMO resolution MEPC.368(79), shall not be allowed."

3 **Para 2.4.6** is deleted.

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

#### **2 CONTROL OF EMISSIONS FROM SHIPS**

4 **Para 2.2.3.** The second paragraph is replaced by the following text:

"In accordance with IACS UI MPC98 (the document is available on the IACS website ([www.iacs.org.uk](http://www.iacs.org.uk))) and the Unified Interpretations to MARPOL Annex VI given in IMO circular MEPC.1/Circ.795/Rev.7, the term "time of the replacement or addition of the engine" shall be taken as the date of:".

5 **Para 2.2.6.** The last sentence is replaced by the following text:

"To identify whether the engine is an identical engine, the Unified Interpretations to MARPOL Annex VI according to IMO circular MEPC.1/Circ.795/Rev.7 as amended shall be considered."

6 **Para 2.2.12.** The last sentence is replaced by the following text:

"When applying this requirement, the Unified Interpretations to MARPOL Annex VI according to IMO circular MEPC.1/Circ.795/Rev.7 shall be considered."

7 **New para 2.2.13** is introduced reading as follows:

**"2.2.13** When applying the provisions of regulation 18.3 of Annex VI to MARPOL 73/78 regarding fuel oil quality including provisions on fuel that shall not cause an engine to exceed the applicable NO<sub>x</sub> emission limit, if biofuel, synthetic fuel and other fuels derived by methods other than petroleum refining or blends containing these fuels, apply, one shall be guided by Section 13 of the Unified Interpretations to MARPOL Annex VI given in IMO circular MEPC.1/Circ.795/Rev.7."

8 **Para 2.6.3.** The next to the last and the last paragraphs are replaced by the following text:

"The attained EEDI shall be calculated by the formula contained in the 2022 Guidelines on the Method of Calculation of the Attained Energy Efficiency Design Index (EEDI) for New Ships given in IMO resolution MEPC.364(79).

For each ship subject to regulation 24 of Annex VI to MARPOL 73/78 on required EEDI, the Administration or any organization duly authorized by it shall report to IMO the required and attained EEDI values and relevant information via a standardized reporting format specified in IMO resolution MEPC.364(79) and taking into account the Unified Interpretations to MARPOL Annex VI given in IMO circular MEPC.1/Circ.795/Rev.7, or via electronic communication within 7 months of completing the surveys required under 2.1.7 of Part I "Regulations for Technical Supervision" of these Guidelines, or for ships delivered prior to 1 April 2022, within 7 months following 1 April 2022."

9 **Para 2.6.4.** The first paragraph is replaced by the following text:

**"2.6.4** In compliance with regulation 24 (former regulation 21) of Annex VI to MARPOL 73/78 for ships of the types specified in this regulation, the attained EEDI shall be less than or equal to the required EEDI:"

10 **Para 2.6.16** is replaced by the following text:

**"2.6.16** On or before 31 December 2018, in the case of a ship of 5000 gross tonnage and above, the SEEMP shall include a description of the methodology that ships will use to collect the ship fuel oil consumption data and the processes that the ship will use to report the data to the Administration or any organization duly authorized by it, in accordance with IMO resolution MEPC.346(78)."

11 **Para 2.6.23.** The last paragraph is replaced by the following text:

"This ship shall not be issued a Statement of Compliance specified in 2.6.22 of this Part unless the SEEMP with a plan of corrective actions is verified taking into account the Unified Interpretations to MARPOL Annex VI given in IMO circular MEPC.1/Circ.795/Rev.7."

12 **Para 2.6.26.** The first paragraph is replaced by the following text:

**"2.6.26** In accordance with the 2022 Guidelines on Survey and Certification of EEDI given in IMO resolution MEPC.365(79), ship survey in relation to EEDI shall be conducted in two stages:".

13 **Para 2.6.27.2.** The sixth paragraph is replaced by the following text:

"electric power table for certain types of ships as defined in the 2022 Guidelines on the Method of Calculation of the Attained EEDI for New Ships given in the IMO resolution MEPC.364(79);".

14 **Para 2.6.27.2.** The twelfth paragraph is replaced by the following text:

"For ships covered by the provisions of paragraph 2.2.5.7 in IMO resolution MEPC.364(79), the electric power table shall be validated in accordance with Appendix 2 to the 2022 Guidelines on Survey and Certification of EEDI given in IMO resolution MEPC.365(79).".

15 **Para 2.6.29** is replaced by the following text:

**"2.6.29** For preliminary and final verification of compliance with the EEDI requirements, IACS PR No. 38 (Rev.4 Feb 2023) "Procedure for Calculation and Verification of EEDI" which contains the Industry Guidelines for Calculation and Verification of EEDI (the document is available on the IACS website ([www.iacs.org.uk](http://www.iacs.org.uk))) shall also be applied.".