



clever solutions | beyond class

CIRCULAR

Unified Interpretations to MARPOL Annex VI

The Marine Environment Protection Committee approved unified interpretations to MARPOL Annex VI concerning the data collection system for fuel oil consumption of ships.

[Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors](#)

C19013 | 05 March 2019

[MEPC.1/Circ.795/Rev.3](#) contains the updated consolidated text of all existing unified interpretations to MARPOL Annex VI, including those set out in circular MEPC.1/Circ.795/Rev.2.

Confirmation of compliance for new ships

Regulation 5.4.5 reads as follows: "⁵ The Administration shall ensure that for each ship to which regulation 22A applies, the SEEMP complies with regulation 22.2 of this Annex. This shall be done prior to collecting data under regulation 22A of this Annex in order to ensure the methodology and processes are in place prior to the beginning of the ship's first reporting period. Confirmation of compliance shall be provided to and retained on board the ship."

Regulation 22.2 reads as follows: "² On or before 31 December 2018, in the case of a ship of 5,000 gross tonnage and above, the SEEMP shall include a description of the methodology that will be used to collect the data required by regulation 22A.1 of this Annex and the processes that will be used to report the data to the ship's Administration."

Regulation 22.3 reads as follows: "³ The SEEMP shall be developed taking into account guidelines adopted by the Organization."

Interpretation: Ships that are delivered on or after 1 January 2019 should keep on board both a SEEMP that is in compliance with regulation 22.2 and confirmation of compliance as required by regulation 5.4.5.

Boil-off gas consumed on board ships

Regulation 22A.1 reads as follows: "¹ From calendar year 2019, each ship of 5,000 gross tonnage and above shall collect the data specified in appendix IX to this Annex, for that and each subsequent calendar year or portion thereof, as appropriate, according to the methodology included in the SEEMP."

Appendix IX reads as follows: "Fuel oil consumption, by fuel oil type in metric tonnes and methods used for collecting fuel oil consumption data".

Interpretation: 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.

Access to the disaggregated data

Regulation 22A.8 reads as follows: "8 Except as provided for in paragraphs 4, 5 and 6 of this regulation, the disaggregated data that underlies the reported data noted in appendix IX to this Annex for the previous calendar year shall be readily accessible for a period of not less than 12 months from the end of that calendar year and be made available to the Administration upon request."

Interpretation: The disaggregated data is not required to be kept onboard the ship provided that the disaggregated data can be made available by the Company.

Act now

Ship owners / Managers / Operators should take into consideration the above unified interpretations to MARPOL Annex VI that incorporate requirements of the Data Collection System for fuel oil consumption of ships.

For further information, please contact our Marine Division at marine@dromon.com