

Title	MARPOL *** / MARPOL 2020 Consolidated Edition / Unified Interpretations to the revised MARPOL Annex I
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UNIFIED INTERPRETATIONS OF ANNEX I

Notes: For the purposes of the Unified Interpretations, the following abbreviations are used:

MARPOL The 1973 MARPOL Convention as modified by the 1978 and 1997 Protocols relating thereto

Regulation Regulation in Annex I of MARPOL

IOPP Certificate International Oil Pollution Prevention Certificate

SBT Segregated ballast tanks

CBT Dedicated clean ballast tanks

COW Crude oil washing system

IGS Inert gas systems

PL Protective location of segregated ballast tanks

CAS Condition Assessment Scheme

1 Definition of oil *Treatment for oily rags*

Reg. 1.1

Oily rags, as defined in the Guidelines for the Implementation of Annex V of MARPOL, should be treated in accordance with Annex V and the procedures set out in the Guidelines.

2 Definition of oil tanker

Reg. 1.5

FPSOs and FSUs are not *oil tankers* and are not to be used for the transport of oil except that, with the specific agreement by the flag and relevant coastal States on a voyage basis, produced oil may be transported to port in abnormal and rare circumstances.

3 Definition of major conversion

Reg. 1.9

3.1 The deadweight to be used for determining the application of provisions of Annex I is the deadweight assigned to an oil tanker at the time of the assignment of the load lines. If the load lines are reassigned for the purpose of altering the deadweight, without alteration of the structure of the ship, any substantial alteration of the deadweight consequential upon such reassignments should not be construed as a "major conversion" as defined in regulation 1.9. However, the IOPP Certificate should indicate only one deadweight of the ship and be renewed on every reassignment of load lines.

3.2 If a crude oil tanker of 40,000 tonnes deadweight and above delivered on or before 1 June 1982 as defined in regulation 1.28.3 satisfying the requirements of COW changes its trade for the carriage of product oil* conversion to CBT or SBT and reissuing of the IOPP Certificate will be necessary. Such conversion should not be considered as a "major conversion" as defined in regulation 1.9.

* *Product oil* means any oil other than crude oil as defined in regulation 1.2.

3.3 When an oil tanker is used solely for the storage of oil and is subsequently put into service in the transport of oil, such a change of function should not be construed as a "major conversion" as defined in regulation 1.9.

3.4 The conversion of an existing oil tanker to a combination carrier, or the shortening of a tanker by removing a transverse section of cargo tanks, should constitute a "major conversion" as defined in regulation 1.9.

3.5 The conversion of an existing oil tanker to a segregated ballast tanker by the addition of a transverse section of tanks should constitute a "major conversion" as defined in regulation 1.9 only when the cargo carrying capacity of the tanker is increased.

3.6 When a ship built as a combination carrier operates exclusively in the bulk cargo trade, the ship may be treated as a ship other than an oil tanker and Form A of the Record of Construction and Equipment should be issued to the ship. The change of such a ship from the bulk trade to the oil trade should not be construed as a "major conversion" as defined in regulation 1.9.

4 Definition of "segregated ballast"

Reg. 1.18

4.1 The segregated ballast system should be a system which is "completely separated from the cargo oil and fuel systems" as required by regulation 1.18. Nevertheless, provision may be made for emergency discharge of the segregated ballast by means of a connection to a cargo pump through a portable spool piece. In this case non-return valves should be fitted on the segregated ballast connections to prevent the passage of oil to the segregated ballast tanks. The portable spool piece should be mounted in a conspicuous position in the pump-room and a permanent notice restricting its use should be prominently displayed adjacent to it.

4.2 Sliding type couplings should not be used for expansion purposes where lines for cargo oil or fuel oil pass through tanks for segregated ballast,

and where lines for segregated ballast pass through cargo oil or fuel oil tanks. This interpretation is applicable to ships, the keel of which is laid, or which are at a similar stage of construction, on or after 1 July 1992.

5 Definition of lightweight

Reg 1.24

The weight of mediums on board for the fixed fire-fighting systems (e.g. freshwater, CO₂, dry chemical powder, foam concentrate, etc.) should be included in the lightweight and lightship condition.

6 Unforeseen delay in delivery of ships

Reg. 1.28

6.1 For the purpose of defining the category of a ship under regulation 1.28, a ship for which the building contract (or keel laying) and delivery were scheduled before the dates specified in these regulations, but which has been subject to delay in delivery beyond the specific date due to unforeseen circumstances beyond the control of the builder and the owner, may be accepted by the Administration as a ship of the category related to the estimated date of delivery. The treatment of such ships should be considered by the Administration on a case-by-case basis, bearing in mind the particular circumstances.

6.2 It is important that ships delivered after the specified dates due to unforeseen delay and allowed to be treated as a ship of the category related to the estimated date of delivery by the Administration should also be accepted as such by port States. In order to ensure this, the following practice is recommended to Administrations when considering an application for such a ship:

.1 the Administration should thoroughly consider applications on a case-by-case basis, bearing in mind the particular circumstances. In doing so in the case of a ship built in a foreign country, the Administration may require a formal report from the authorities of the country in which the ship was built, stating that the delay was due to unforeseen circumstances beyond the control of the builder and the owner;

.2 when a ship is treated as a ship of the category related to the estimated date of delivery upon such an application, the IOPP Certificate for the ship should be endorsed to indicate that the ship is accepted by the Administration as such a ship; and

.3 the Administration should report to the Organization on the identity of the ship and the grounds on which the ship has been accepted as such a ship.

7 Definition of "a similar stage of construction"

Regs. 1.28, 1.30

A similar stage of construction means the stage at which:

.1 construction identifiable with a specific ship begins; and

.2 assembly of that ship has commenced comprising at least 50 tonnes or one per cent of the estimated mass of all structural material, whichever is less.

8 Definition of generation of ships

Regs. 1.28.2, 1.28.4, 1.28.6, 1.28.7, 1.28.8, 1.28.9

For the purpose of defining the ships in accordance with regulations 1.28.2, 1.28.4, 1.28.6, 1.28.7, 1.28.8 and 1.28.9, a ship which falls into any one of the categories listed in subparagraphs 1, 2, 3, 4.1, 4.2, or 4.3 of these paragraphs should be considered as a ship falling under the corresponding definition.

9 Annex I substances which through their physical properties inhibit effective product/water separation and monitoring

Reg. 2.4

9.1 The Government of the receiving Party should establish appropriate measures in order to ensure that provisions of 9.2 are complied with.

9.2 A tank which has been unloaded should, subject to the provisions of 9.3, be washed and all contaminated washings should be discharged to a reception facility before the ship the port of unloading for another port.

9.3 At the request of the ship's master, the Government of the receiving Party may exempt the ship from the requirements referred to in 9.2, where it is satisfied that:

.1 the tank unloaded is to be reloaded with the same substance or another substance compatible with the previous one and that the tanker will not be washed or ballasted prior to loading; and

.2 the tank unloaded is neither washed nor ballasted at sea if the ship is to proceed to another port unless it has been confirmed in writing that a reception facility at that port is available and adequate for the purpose of receiving the residues and solvents necessary for the cleaning operations.

9.4 An exemption referred to in 9.3 should only be granted by the Government of the receiving Party to a ship engaged in voyages to ports or terminals under the jurisdiction of other Parties to the Convention. When such an exemption has been granted it should be certified in writing by the Government of the receiving Party.

9.5 In the case of ships retaining their residues on board and proceeding to ports or terminals under the jurisdiction of other Parties to the Convention, the Government of the receiving Party is advised to inform the next port of call of the particulars of the ship and cargo residues, for

their information and appropriate action for the detection of violations and enforcement of the Convention.

10 Conditions for waiver

Regs. 3.4, 3.5, 14.5.3

The International Oil Pollution Prevention Certificate should contain sufficient information to permit the port State to determine if the ship complies with the waiver conditions regarding the phrase "restricted voyages as determined by the Administration". This may include a list of ports, the maximum duration of the voyage between ports having reception facilities, or similar conditions as established by the Administration.

11 Voyage of 72 h or less in duration

Regs. 3.4 and 3.5.2.3.2

The time limitation "of 72 h or less in duration" in regulations 3.4 and 3.5.2.3.2 should be counted:

- .1 from the time the tanker leaves the special area, when a voyage starts within a special area; or
- .2 from the time the tanker leaves a port situated outside the special area to the time the tanker approaches a special area.

12 Definition of "all oily mixtures"

Regs. 3.4 and 3.5.2.4

The phrase "all oily mixtures" in regulations 3.4 and 3.5.2.4 includes all ballast water and tank washing residues from cargo oil tanks.

13 Equivalents

Reg. 5

Acceptance by and Administration under regulation 5 of any fitting, material, appliance, or apparatus as an alternative to that required by Annex I includes type approval of pollution prevention equipment which is equivalent to that specified in resolution [A.393\(X\)](#)*. An Administration that allows such type approval shall communicate particulars thereof, including the test results on which the approval of equivalency was based, to the Organization in accordance with regulation 5.2.

* For oily-water separating equipment for machinery space bilges of ships, refer to Guidelines and specifications for pollution prevention equipment for machinery space bilges (resolution [MEPC.60\(33\)](#)), 2011 Guidelines and specifications for add-on equipment for upgrading resolution [MEPC.60\(33\)](#)-compliant oil filter equipment (resolution [MEPC.205\(62\)](#)), and Revised guidelines and specifications for pollution prevention equipment for machinery spaces of ships (resolution [MEPC.107\(49\)](#), as amended by resolution [MEPC.285\(70\)](#)). For oil discharge monitoring and control systems installed on oil tankers built before 2 October 1986, refer to the Guidelines and specifications for oil discharge monitoring and control systems for oil tankers (resolution [A.496\(XII\)](#)), and for oil discharge monitoring and control systems installed on oil tankers built after 2 October 1986, refer to Revised guidelines and specifications for oil discharge monitoring and control systems (resolution [A.586\(14\)](#)). For oil discharge monitoring and control systems installed on oil tankers the keels of which are laid or are in a similar stage of construction on or after 1 January 2005, refer to the Revised guidelines and specifications for oil discharge monitoring and control systems (resolution [MEPC.108\(49\)](#), as amended by resolution [MEPC.240\(65\)](#)).

With regard to the term "appropriate action, if any" in regulation 5.2, any Party to the Convention that has an objection to an equivalency submitted by another Party should communicate this objection to the Organization and to the Party which allowed the equivalency within one year after the Organization circulates the equivalency to the Parties. The Party objecting to the equivalency should specify whether the objection pertains to ships entering its ports.

14 Survey and inspection

Regs. 6.1.3, 6.1.4

Intermediate and annual survey for ships not required to hold an IOPP Certificate

The applicability of regulations 6.1.3 and 6.1.4 to ships which are not required to hold an International Oil Pollution Prevention Certificate should be determined by the Administration.

15 Designation of the type of oil tankers

Regs. 7, 19

15.1 Oil tankers must be designated on the Supplement Form B to the IOPP Certificate as either "crude oil tanker", "product carrier" or "crude oil/product carrier". Furthermore, the requirements contained in regulation 19 differ for different age categories of "crude oil tankers" and "product carriers", and compliance with these provisions is recorded on the IOPP Certificate. Oil trades in which different types of oil tankers are allowed to be engaged are as follows:

- .1 *Crude oil/product carrier* is allowed to carry either crude oil or product oil, or both simultaneously;
- .2 *Crude oil tanker* is allowed to carry crude oil but is prohibited from carrying product oil; and
- .3 *Product carrier* is allowed to carry product oil but is prohibited from carrying crude oil.

15.2 In determining the designation of the type of oil tanker on the IOPP Certificate based on the compliance with the provisions for SBT, PL, CBT and COW, the following standards should apply.

15.3 *Oil tankers delivered after 1 June 1982 as defined in regulation 1.28.4 of less than 20,000 tonnes deadweight*

15.3.1 These oil tankers may be designated as "crude oil/product carriers".

15.4 *Oil tankers delivered after 1 June 1982 as defined in regulation 1.28.4 of 20,000 tonnes deadweight and above*

15.4.1 Oil tankers satisfying the requirements for SBT + PL+ COW may be designated as "crude oil/product carrier".

15.4.2 Oil tankers satisfying the requirements for SBT + PL but not COW should be designated as "product carrier".

15.4.3 Oil tankers of 20,000 tonnes deadweight and above but less than 30,000 tonnes deadweight not carrying crude oil, fuel oil, heavy diesel oil or lubricating oil as cargo, not fitted with SBT PL, should be designated as "product carrier".

15.5 *Oil tankers delivered on or before 1 June 1982 as defined in regulation 1.28.3 but delivered after 31 December 1979 as defined in regulation 1.28.2 of 70,000 tonnes deadweight and above*

15.5.1 The oil tankers satisfying the requirements for SBT may be designated as "crude oil/product carrier".

15.6 *Oil tankers delivered on or before 1 June 1982 as defined in regulation 1.28.3 of less than 40,000 tonnes deadweight*

15.6.1 These oil tankers may be designated as "crude oil/product carrier".

15.7 *Oil tankers delivered on or before 1 June 1982 as defined in regulation 1.28.3 of 40,000 tonnes deadweight and above*

15.7.1 Oil tankers satisfying the requirements for SBT should be designated as "crude oil/product carrier".

15.7.2 Oil tankers satisfying the requirements for COW only should be designated as "crude oil tanker".

15.7.3 Oil tankers satisfying the requirements for CBT should be designated as "product carrier".

16 New form of IOPP Certificate or its Supplement

Reg. 9

In the case where the form of the IOPP Certificate or its Supplement is amended, and this amendment does not cause a shortening of the validity of the ship's IOPP Certificate, the existing form of the certificate or supplement which is current when the amendment enters into force may remain valid until the expiry of that certificate, provided that, at the first survey after the date of entry into force of the amendment, necessary changes are indicated in the existing certificate or supplement by means of suitable corrections, e.g. striking over the invalid entry and typing the new entry.

17 Revalidation of an IOPP Certificate

Reg. 10

Where an annual or an intermediate survey required in regulation 6 of Annex I of MARPOL is not carried out within the period specified in that regulation, the IOPP Certificate ceases to be valid. When a survey corresponding to the requisite survey is carried out subsequently, the validity of the certificate may be restored without altering the anniversary and expiry date of the original Certificate and the Certificate endorsed to this effect. The thoroughness and stringency of such survey will depend on the period for which the prescribed survey has elapsed and the conditions of the ship.

18 Capacity of oil residue (sludge) tanks

Reg. 12.3.1

18.1 To assist Administrations in determining the adequate capacity of oil residue (sludge) tanks, the following criteria may be used as guidance. These criteria should not be construed as determining the amount of oily residues which will be produced by the machinery installation in a given period of time. The capacity of oil residue (sludge) tanks may, however, be calculated upon any other reasonable assumptions. For a ship the keel of which is laid or which is at a similar stage of construction on or after 31 December 1990, the guidance given in items .4 and .5 below should be used in lieu of the guidance contained in items .1 and .2.

.1 For ships which do not carry ballast water in oil fuel tanks, the minimum oil residue (sludge) tank capacity (V_1) should be calculated by the following formula:

$$V_1 = K_1CD(m^3)$$

where:

K_1 = 0.01 for ships where heavy fuel oil is purified for main engine use, or 0.005 for ships using diesel oil or heavy fuel oil which does not require purification before use;

C = daily fuel oil consumption (metric tons); and

D = maximum period of voyage between ports where oil residue (sludge) can be discharged ashore (days). In the absence of precise data a figure of 30 days should be used.

.2 When such ships are fitted with homogenizers, oil residue (sludge) incinerators or other recognized means on board for the control of oil residue (sludge), the minimum oil residue (sludge) tank capacity (V_1) should, in lieu of the above, be:

$V_1 = 1 \text{ m}^3$ for ships of 400 gross tonnage and above but less than 4,000 gross tonnage, or 2 m^3 for ships of 4,000 gross tonnage and above.

.3 For ships which carry ballast water in fuel oil tanks, the minimum oil residue (sludge) tank capacity (V_2) should be calculated by the following formula:

$$V_2 = V_1 + K_2B(\text{m}^3)$$

where:

V_1 = oil residue (sludge) tank capacity specified in .1 or .2 above in m^3 ;

K_2 = 0.01 for heavy fuel oil bunker tanks, or 0.005 for diesel oil bunker tanks; and

B = capacity of water ballast tanks which can also be used to carry oil fuel (tonnes).

.4 For ships which do not carry ballast water in fuel oil tanks, the minimum oil residue (sludge) tank capacity (V_1) should be calculated by the following formula:

$$V_1 = K_1CD(\text{m}^3)$$

where:

K_1 = 0.015 for ships where heavy fuel oil is purified for main engine use or 0.005 for ships using diesel oil or heavy fuel oil which does not require purification before use;

C = daily fuel oil consumption (m^3); and

D = maximum period of voyage between ports where oil residue (sludge) can be discharged ashore (days). In the absence of precise data a figure of 30 days should be used.

.5 For ships where the building contract is placed, or in the absence of a building contract, the keel of which is laid before 1 July 2010, and which are fitted with homogenizers, oil residue (sludge) incinerators or other recognized means on board for the control of oil residue (sludge), the minimum oil residue (sludge) tank capacity should be:

.5.1 50% of the value calculated according to item .4 above; or

.5.2 1 m^3 for ships of 400 gross tonnage and above but less than 4,000 gross tonnage or 2 m^3 for ships of 4,000 gross tonnage and above; whichever is the greater.

18.2 Administrations should establish that in a ship the keel of which is laid or which is at a similar stage of construction on or after 31 December 1990, adequate tank capacity, which may include the oil residue (sludge) tank(s) referred to under 18.1 above, is available also for leakage, drain and waste oils from the machinery installations. In existing installations this should be taken into consideration as far as reasonable and practicable.

19 Designated pump for disposal

Reg. 12.3.2

A designated pump should be interpreted as any pump used for the disposal of oil residue (sludge) through the standard discharge connection referred to in regulation 13, or any pump used to transfer oil residue (sludge) to any other approved means of disposal such as an incinerator, auxiliary boiler suitable for burning oil residues (sludge) or other acceptable means which are prescribed in paragraph 3.2 of the Supplement to IOPP Certificate Form A or B.

20 No discharge connection

Reg. 12.3.3

A screw-down non-return valve, arranged in lines connecting to common piping leading to the standard discharge connection required by regulation 13, provides an acceptable means to prevent oil residue (sludge) from being transferred or discharged to the bilge system, oily bilge water holding tank(s), tank top or oily water separators.

21 Overboard connection of oil residue (sludge) tanks

Reg. 12.3.4

Ships having piping to and from oil residue (sludge) tanks to overboard discharge outlets, other than the standard discharge connection referred to in regulation 13 installed prior to 4 April 1993 may comply with regulation 12.3.4 by the installation of blanks in this piping.

22 Cleaning of oil residue (sludge) tanks and discharge of residues

Reg. 12.3.5

To assist Administrations in determining the adequacy of the design and construction of oil residue (sludge) tanks to facilitate their cleaning and the discharge of residues to reception facilities, the following guidance is provided, having effect on ships the keel of which is laid or which is at a similar stage of construction on or after 31 December 1990:

- .1 sufficient man-holes should be provided such that, taking into consideration the internal structure of the oil residue (sludge) tanks, all parts of the tank can be reached to facilitate cleaning;
- .2 oil residue (sludge) tanks in ships operating with heavy oil, that needs to be purified for use, should be fitted with adequate heating arrangements or other suitable means to facilitate the pump ability and discharge of the tank content;
- .3 the oil residue (sludge) tank should be provided with a designated pump for the discharge of the tank content to reception facilities. The pump should be of a suitable type, capacity and discharge head, having regard to the characteristics of the liquid being pumped and the size and position of tank(s) and the overall discharge time.
- .4 where any oil residue (sludge) tank (i.e. oil residue (sludge) service tank)* that directly supplies oil residue (sludge) to the means of the disposal of oil residues (sludge) prescribed in paragraph 3.2 of the Supplement to IOPP Certificate Form A or B is equipped with suitable means for drainage, the requirements in subparagraph .3 above may not be applied to the oil residue (sludge) tank.

* "Oil residue (Sludge) Service tank" means a tank for preparation of oil residue (sludge) for incineration as defined in paragraph 5.3.3 of the appendix to the annex to the 2008 Revised guidelines for systems for handling oily wastes in machinery spaces of ships incorporating guidance notes for an integrated bilge water treatment system (IBTS) ([MEPC.1/Circ.642](#), as amended by [MEPC.1/Circ.676](#) and [MEPC.1/Circ.760](#)).

23 Oil fuel tank protection

Regs. 12A.6, 12A.7, 12A.8

23.1 Valves for oil fuel tanks located in accordance with the provisions of paragraphs 6, 7 and 8 of MARPOL Annex I, regulation 12A, may be treated in a manner similar to the treatment of suction wells as per MARPOL regulation 12A.10 and, therefore, arranged at a distance from the ship's bottom of not less than $h/2$.

23.2 Valves for tanks which are permitted to be located at a distance from the ship's bottom or side at a distance less than h or w , respectively, in accordance with the accidental oil fuel outflow performance standard of MARPOL Annex I, regulation 12A.11, may be arranged at the distance less than h or w , respectively.

23.3 Fuel tank air escape pipes and overflow pipes are not considered as part of " *lines of fuel oil piping* " and, therefore, may be located at a distance from the ship's side of less than w .

23.4 In addition to being as small as practicable, the size of the suction wells mentioned in MARPOL Annex I, regulation 12A.10, should be appropriate to the size of the suction pipe and area covered.

24 Measuring distance "h"

Regs. 12A.6, 12A.7, 12A.8, 12A.11.8

24.1 The distance "h" should be measured from the moulded line of the bottom shell plating at right angle to it (regulation 12A, Figure 1).

.1 For vessels designed with a skag, the skag should not be considered as offering protection for the FO tanks. For the area within skag's width the distance "h" should be measured perpendicular to a line parallel to the baseline at the intersection of the skag and the moulded line of the bottom shell plating as indicated in Figure A.

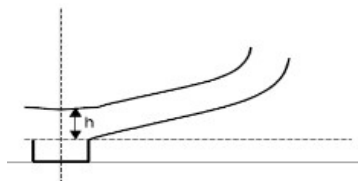


Figure A

.2 For vessels designed with a permanent trim, the baseline should not be used as a reference point. The distance "h" should be measured perpendicular to the moulded line of the bottom shell plating at the relevant frames where fuel tanks are to be protected.

24.2 For vessels designed with deadrising bottom, the distance "1.5h" should be measured from the moulded line of the bottom shell plating but at right angle to the baseline, as indicated in Figure B.

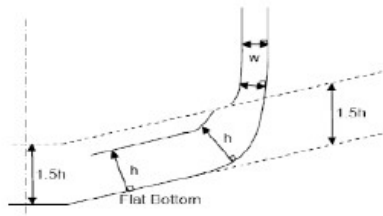


Figure B

24.3 Paragraphs 1 and 2, above also apply to the reference to the distance "h" in regulation 12A.11.8.

25 Application of regulation 12A to MODUs

Regs. 12A.7, 12A.8

In applying regulation 12A of MARPOL Annex I to column-stabilized Units (MODUs) as defined in the MODU Code, for the purpose of placing the oil fuel tanks, the location limitations of paragraphs 7 and 8 of the regulation apply to those areas subject to damage as follows:

- .1 only those columns, underwater hulls and braces on the periphery of the unit shall be assumed to be damaged and the damage shall be assumed in the exposed portions of the columns, underwater hulls and braces;
- .2 columns and braces shall be assumed to be damaged at any level between 5.0 m above and 3.0 m below the range of draughts in the MODUs operating manual for normal and severe weather operations; and
- .3 underwater hull and footings shall be assumed to be damaged when operating in a transit condition in the same manner as indicated in .1 and .2, having regard to their shape.

26 Automatic stopping device required by regulation 15.3.2

Regs.14, 15

Regulation 15.3.2 includes a reference to regulation 14.7 which requires both a 15 ppm bilge alarm and a stopping device which will ensure that the discharge is automatically stopped when the oil content of the effluent exceeds 15 ppm. Since, however, this is not a requirement of regulation 14 for ships of less than 10,000 gross tonnage, such ships need not be required to be equipped with such alarm and stopping device if no effluent from machinery space bilge is to be discharged within special areas. Conversely, the discharge of effluent within special areas from ships without 15ppm bilge alarm and an automatic stopping device is a contravention of the Convention even if the oil content of the effluent is below 15 ppm.

27 Control of discharge of ballast water from fuel oil tanks

Reg. 14.1

27.1 The second sentence of regulation 14.1 should be interpreted as follows:

Any ship of 400 gross tonnage and above but less than 10,000 gross tonnage:

- .1 which does not carry water ballast in oil fuel tanks should be fitted with 15 ppm oil filtering equipment for the control of discharge of machinery space bilges;
- .2 which carries water ballast in oil fuel tanks should be fitted with the equipment required by regulation 14.2 for the control of machinery space bilges and dirty ballast water from oil fuel tanks. Ships on which it is not reasonable to fit this equipment should retain on board dirty ballast water from oil fuel tanks and discharge it to reception facilities.

27.2 The above equipment should be of adequate capacity to deal with the quantities of effluent to be discharged.

28 Oil filtering equipment

Regs. 14.1, 14.2

Oil filtering equipment referred to in regulations 14.1 and 14.2 is a 15 ppm bilge separator and may include any combination of a separator, filter or coalescer and also a single unit designed to produce an effluent with oil content not exceeding 15 ppm.

29 Waivers for restricted voyages

Reg. 14.5.3.4

The International Oil Pollution Prevention Certificate should contain sufficient information to permit the port State to determine if the ship complies with the waiver conditions regarding the phrase "restricted voyages as determined by the Administration". This may include a list of ports, the maximum duration of the voyage between ports having reception facilities, or similar conditions as established by the Administration.

30 Controls of discharge of oil

Reg.15

Transfer of non-oil-cargo related oily residues to slop tanks of oil tankers

- 30.1 If non-oil-cargo related oily residues are transferred to slop tanks of oil tankers, the discharge of such residues should be in compliance with regulation 34.

30.2 The above interpretation should not be construed as relaxing any existing prohibition of piping arrangements connecting the engine room and slop tanks which may permit cargo to enter the machinery spaces. Any arrangements provided for machinery space bilge discharges into slop tanks should incorporate adequate means to prevent any backflow of liquid cargo and gases into the machinery spaces. Any such arrangements do not constitute a relaxing of the requirements of regulation 14 with respect to oil filtering equipment.

31 Definition of "en route"

Reg.15.2.1

En route means that the ship is underway at sea on a course or courses, including deviation from the shortest direct route, which, as far as practicable for navigation purposes, will cause any discharge to be spread over as great an area of the sea as is reasonable and practicable.

32 Oil fuel

Reg.16.2

Large quantities of oil fuel

32.1 The phrase "large quantities of oil fuel" in regulation 16.2 refers to ships which are required to stay at sea for extended periods because of the particular nature of their operation and trade. Under the circumstances considered, these ships would be required to fill their empty oil fuel tanks with water ballast in order to maintain sufficient stability and safe navigation conditions.

32.2 Such ships may include inter alia certain large fishing vessels or ocean-going tugs. Certain other types of ships which for reasons of safety, such as stability, may be required to carry ballast in oil fuel tanks may also be included in this category.

33 Application of regulation 16.4

Reg. 16.4

When the separation of oil fuel tanks and water ballast tanks is unreasonable or impracticable for ships covered by regulation 16.4, ballast water may be carried in oil fuel tanks, provided that such ballast water is discharged into the sea in compliance with regulations 15.2, 15.3, 15.5 and 15.6 or into reception facilities in compliance with regulation 15.9.

34 Oil tankers used for the storage of dirty ballast

Regs. 18, 19, 20, 33 and 35

When an oil tanker is used as a floating facility to receive dirty ballast discharged from oil tankers, such a tanker is not required to comply with the provisions of regulations 18, 19, 20, 33 and 35.

35 SBT, CBT, COW and PL requirements

Reg. 18.3.2

Capacity of SBT

For the purpose of application of regulation 18.3.2, as amended, the following operations of oil tankers are regarded as falling within the category of exceptional cases:

- .1 when combination carriers are required to operate beneath loading or unloading gantries;
- .2 when tankers are required to pass under a low bridge;
- .3 when local port or canal regulations require specific draughts for safe navigation;
- .4 when loading and unloading arrangements require the tanker to be at a draught deeper than that achieved when all segregated ballast tanks are full;
- .5 close-up inspection or/and steel thickness measurement using rafts where permitted by the rules; and
- .6 tank hydrostatic pressure tests.

36 Segregated ballast conditions for oil tankers less than 150 m in length

Reg. 18.5

36.1 In determining the minimum draught and trim of oil tankers less than 150 m in length to be qualified as SBT oil tankers, the Administration should follow the guidance set out in appendix 1.

36.2 The formulae set out in appendix 1 replace that set out in regulation 18.2, and these oil tankers should also comply with the conditions laid down in regulations 18.3 and 18.4 in order to be qualified as SBT oil tankers.

37 Oil tankers as defined in regulation 1.28.3 of 40,000 tonnes deadweight and above with CBT and COW

Regs. 18.7, 18.8

37.1 Oil tankers as defined in regulation 1.28.3 of 40,000 tonnes deadweight and above which are fitted with CBT and COW and designated as "crude oil/product carriers" in the Supplement to the IOPP Certificate operate as follows:

- .1 They should always operate with CBT and neither crude oil nor product oil should be carried in dedicated clean ballast tanks; and
- .2 When carrying a complete or partial cargo of crude oil they should, in the crude carrying tanks, also operate also with COW for sludge control.

37.2 Approved procedures by the Administration for changeover between COW and CBT modes on tankers with common or separate independent piping and pump arrangements for cargo and (CBT) ballast handling should be continuously acceptable as long as carriage of crude oil in CBT mode is not given as permissible.

38 Capacity of CBT

Reg. 18.8

For the purposes of determining the capacity of CBT, the following tanks may be included:

- .1 segregated ballast tanks; and
- .2 cofferdams and fore and after peak tanks, provided that they are exclusively used for the carriage of ballast water and are connected with permanent piping to ballast water pumps.

39 CBT oil content meter

Reg. 18.8.3

The discharge of ballast from the dedicated clean ballast tanks should be continuously monitored (but not necessarily recorded) by the oil content meter required by regulation 18.8.3 so that the oil content, if any, in the ballast water can be observed from time to time. This oil content meter is not required to come into operation automatically.

40 Protective location of SBT

Regs. 18.12 to 18.15

40.1 The measurement of the minimum width of wing tanks and of the minimum vertical depth of double bottom tanks should be taken and value of protective areas (PAC and PAs) should be calculated in accordance with the "Interim recommendation for a unified interpretation of regulations 18.12-18.15 - Protective location of segregated ballast spaces" - set out in appendix 2.

40.2 Ships being built in accordance with this interpretation should be regarded as meeting the requirements of regulations 18.12 to 18.15 and would not need to be altered if different requirements were to result from

40.3 If, in the opinion of the Administration, any oil tanker the keel of which was laid or which was at a similar stage of construction before 1 July 1980 complies with the requirements of regulation 18.12-18.15 without taking into account the above Interim Recommendation, the Administration may accept such tanker as complying with regulation 18.12-18.15.

41 Oil tankers with independent tanks

Reg.19

Oil tankers with independent tanks are considered as double-hull oil tankers, provided that they are designed and constructed to be such that the minimum distances between the cargo tank boundaries and ship bottom and side-shell plating comply with the provisions of regulation 19.

42 Width of wing tanks and height of double bottom tanks at turn of the bilge area

Reg.19.3.3

The requirements of regulation 19.3.3 at turn of the bilge areas are applicable throughout the entire tank length.

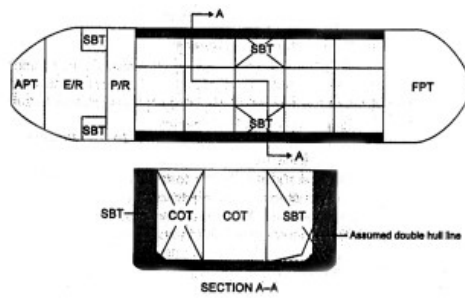
43 Aggregate capacity of ballast tanks

Reg. 19.4

43.1 Any ballast carried in localized inboard extensions, indentations or recesses of the double hull, such as bulkhead stools, should be excess ballast above the minimum requirement for segregated ballast capacity according to regulation 18.

43.2 In calculating the aggregate capacity under regulation 19.3.4, the following should be taken into account:

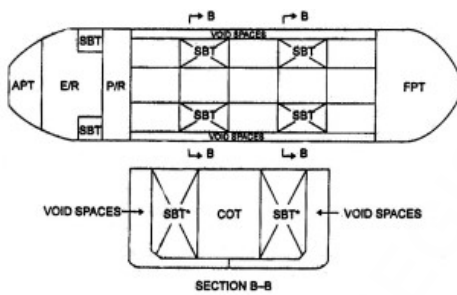
- .1 the capacity of engine-room ballast tanks should be excluded from the aggregate capacity of ballast tanks;
- .2 the capacity of ballast tank located inboard of double hull should be excluded from the aggregate capacity of ballast tanks (see figure 1).



SBT: Segregated ballast tank APT: After peak tank
 COT: Cargo oil tank E/R: Engine room
 FPT: Fore peak tank P/R: Pumping room

Figure 1

.3 spaces such as void spaces located in the double hull within the cargo tank length should be included in the aggregate capacity of ballast tanks (see figure 2).



SBT: Segregated ballast tank APT: After peak tank
 COT: Cargo oil tank E/R: Engine room
 FPT: Fore peak tank P/R: Pumping room

Figure 2

44 Definition of double side wing tanks

Reg. 19.6.2

Wing tanks required for the protection of the entire cargo tank length by regulation 19.6.2, for the purpose of compliance with regulation 21.4.2, can be used as cargo tanks for the carriage of oil other than heavy grade oils when the ship is provided with cargo tanks so arranged that the capacity of each cargo tank does not exceed 700 m³.

45 Definition of Category 2 oil tanker

Reg. 20.3.2

Any Category 2 oil tanker must be provided with segregated ballast tanks protectively located (SBT/PL).

46 Major conversion in respect of regulation 20.4

Reg. 20.4

For the purpose of determining the application date for the requirements of regulation 20.4 of MARPOL Annex I, where an oil tanker has undergone a major conversion, as defined in regulation 1 of MARPOL Annex I, that has resulted in the replacement of the fore-body, including the entire cargo carrying section, the major conversion completion date of the oil tanker shall be deemed to be the date of delivery of the ship referred to in regulation 20.4 of MARPOL Annex I, provided that:

- .1 the oil tanker conversion was completed before 6 July 1996;
- .2 the conversion included the replacement of the entire cargo section and fore-body and the tanker complies with all the relevant provisions of MARPOL Annex I applicable at the date of completion of the major conversion; and
- .3 the original delivery date of the oil tanker will apply when considering the 15 years of age threshold relating to the first CAS survey to be completed in accordance with regulation 20.6 of MARPOL Annex I.

47 Wing tanks and double bottom spaces of tankers as defined in regulation 1.28.5 used for water ballast

Reg. 20.6

If the wing tanks and double bottom tanks referred to in regulation 20.6 are used for water ballast, the ballast arrangement should at least be in compliance with the Revised Specifications for Oil Tankers with Dedicated CBT (Res.A.495(12)).

48 Requirements for the Condition Assessment Scheme (CAS)

Reg. 21.6.1

The first CAS survey shall be carried out concurrent with the first intermediate or renewal survey:

- after 5 April 2005, or
- after the date when the ship reaches 15 years of age,

whichever occurs later.

49 Pump-room bottom protection

Reg. 22.5

49.1 The term "pump-room" means a cargo pump-room. Ballast piping is permitted to be located within the pump-room double bottom provided any damage to that piping does not render the ship's pumps located in the "pump-room" ineffective.

49.2 The double bottom protecting the "pump-room" can be a void tank, a ballast tank or, unless prohibited by other regulations, a fuel oil tank.

49.3 Bilge wells may be accepted within the double bottom provided that such wells are as small as practicable and the distance between the well bottom and the ship's baseline measured at right angles to the ship's baseline is not less than 0.5h.

49.4 Where a portion of the pump-room is located below the minimum height required in regulation 22.2, then only that portion of the pump-room is required to be a double bottom.

50 Accidental oil outflow performance *Overpressure in kPa*

Reg. 23.7.3.2

If an inert gas system is fitted, the normal overpressure, in kPa, is to be taken as 5 kPa.

51 Tank size limitation and damage stability

Reg. 24.1.2

Bottom damage assumptions

When applying the figures for bottom damage within the forward part of the ship as specified in regulation 24.1.2 for the purpose of calculating both oil outflow and damage stability, 0.3L from the forward perpendicular should be the aftermost point of the extent of damage.

52 Hypothetical oil outflow for combination carriers

Reg.25

For the purpose of calculation of the hypothetical oil outflow for combination carriers:

- .1 the volume of a cargo tank should include the volume of the hatchway up to the top of the hatchway coamings, regardless of the construction of the hatch, but may not include the volume of any hatch cover; and
- .2 for the measurement of the volume to moulded lines, no deduction should be made for the volume of internal structures.

53 Calculation of hypothetical oil outflow

Reg. 25.1.2

In a case where the width b_i is not constant along the length of a particular wing tank, the smallest b_i value in the tank should be used for the purposes of assessing the hypothetical outflows of oil O_c and O_s .

54 Hypothetical outflow of oil *Location of valves*

Reg. 25.3.3

54.1 Valves or other closing arrangements located in accordance with the provisions of MARPOL Annex I, regulation 25.3.3, may be treated in a manner similar to the treatment of suction wells as per MARPOL regulation 12A.10 and, therefore, arranged at a distance from the ship's bottom of not less than $h/2$.

54.2 In addition to being not excessive in area, the size of the suction wells mentioned in MARPOL Annex I, regulation 25.3.3, should be appropriate to the size of the suction pipe and area covered.

55 Intact stability

Reg. 27

55.1 For proving compliance with regulation 27, either subparagraph .1 or .2, below, should be applied:

- .1 The ship should be loaded with all cargo tanks filled to a level corresponding to the maximum combined total of vertical moment of volume plus free surface inertia moment at 0° heel, for each individual tank. Cargo density should correspond to the available cargo deadweight at the

displacement at which transverse KM reaches a minimum value, assuming full departure consumables and 1% of the total water ballast capacity. The maximum free surface moment should be assumed in all ballast conditions. For the purpose of calculating G_{Mo}, liquid free surface corrections should be based on the appropriate upright free surface inertia moment. The righting lever curve may be corrected on the basis of liquid transfer moments.

.2 An extensive analysis covering all possible combinations of cargo and ballast tank loading should be carried out. For such extensive analysis conditions, it is considered that:

.2.1 weight, centre of gravity coordinates and free surface moment for all tanks should be according to the actual content considered in the calculations; and

.2.2 the extensive calculations should be carried out in accordance with the following:

.2.2.1 the draughts should be varied between light ballast and scantling draught;

.2.2.2 consumables including, but not restricted to, fuel oil, diesel oil and fresh water corresponding to 97%, 50% and 10% content should be considered;

.2.2.3 for each draught and variation of consumables, the available deadweight should comprise ballast water and cargo, such that combinations between maximum ballast and minimum cargo and vice versa, are covered. In all cases, the number of ballast and cargo tanks loaded is to be chosen to reflect the worst combination of VCG and free surface effects. Operational limits on the number of tanks considered to be simultaneously slack and exclusion of specific tanks should not be permitted. All ballast tanks should have at least 1% content;

.2.2.4 cargo densities between the lowest and highest intended to be carried should be considered; and

.2.2.5 sufficient steps between all limits should be examined to ensure that the worst conditions are identified. A minimum of 20 steps for the range of cargo and ballast content, between 1% and 99% of total capacity, should be examined. More closely spaced steps near critical parts of the range may be necessary.

At every stage, the criteria described in regulation 27.1.1 and 27.1.2 of MARPOL Annex 1 are to be met.

55.2 In applying θ_f , openings which "cannot be closed weathertight" include ventilators (complying with regulation 19(4) of the International Convention on Load Lines, 1966) that for operational reasons have to remain open to supply air to the engine room or emergency generator room (if the same is considered buoyant in the stability calculation or protecting openings leading below) for the effective operation of the ship.

56 Operating draught

Reg. 28.1

With regard to the term "any operating draught reflecting actual partial or full load conditions", the information required should enable the damage stability to be assessed under conditions the same as or similar to those under which the ship is expected to operate.

57 Suction wells

Reg. 28.2

For the purpose of determining the extent of assumed damage under regulation 28.2, suction wells may be neglected, provided such wells are not excessive in area and extend below the tank for a minimum distance and in no case more than half the height of the double bottom.

58 Subdivision and damage stability

Reg. 28.3

Other openings capable of being closed weathertight do not include ventilators (complying with regulation 19(4) of the International Convention on Load Lines, 1966) that for operational reasons have to remain open to supply air to the engine room or emergency generator room (if the same is considered buoyant in the stability calculation or protecting openings leading below) for the effective operation of the ship.

59 Tanks with smooth walls

Reg. 29.2.3.3

The term "tanks with smooth walls" should be taken to include the main cargo tanks of oil/bulk/ore carriers which may be constructed with vertical framing of a small depth. Vertically corrugated bulkheads are considered smooth walls.

60 Pumping and piping arrangements

Reg. 30.2

Piping arrangements for discharge above the waterline

60.1 Under regulation 30.2, lines for discharge to the sea above the waterline must be led either:

.1 to a ship's discharge outlet located above the waterline in the deepest ballast condition; or

.2 to a midship discharge manifold or, where fitted, a stern or bow loading/discharge facility above the upper deck.

60.2 The ship's side discharge outlet referred to in 60.1.1 should be so located that its lower edge will not be submerged when the ship carries the maximum quantity of ballast during its ballast voyages, having regard to the type and trade of the ship. The discharge outlet located above the waterline in the following ballast condition will be accepted as complying with this requirement:

- .1 on oil tankers not provided with SBT or CBT, the ballast condition when the ship carries both normal departure ballast and normal clean ballast simultaneously; and
- .2 on oil tankers provided with SBT or CBT, the ballast condition when the ship carries ballast water in segregated or dedicated clean ballast tanks, together with additional ballast in cargo oil tanks in compliance with regulation 18.3.

60.3 The Administration may accept piping arrangements which are led to the ship's side discharge outlet located above the departure ballast waterline but not above the waterline in the deepest ballast condition, if such arrangements have been fitted before 1 January 1981.

60.4 Although regulation 30.2 does not preclude the use of the facility referred to in 60.1.2 for the discharge of ballast water, it is recognized that the use of this facility is not desirable, and it is strongly recommended that ships be provided with either the side discharge outlets referred to in 60.1.1 or the part flow arrangements referred to in regulation 30.6.5.

61 Small diameter line

Reg. 30.4.2

61.1 For the purpose of application of regulation 30.4.2, the cross-sectional area of the small diameter line should not exceed:

- .1 10% of that of a main cargo discharge line for oil tankers delivered after 1 June 1982, as defined in regulation 1.28.4, or oil tankers delivered on or before 1 June 1982, as defined in regulation 1.28.3 not already fitted with a small diameter line; or
- .2 25% of that of a main cargo discharge line for oil tankers delivered on or before 1 June 1982, as defined in regulation 1.28.3 already fitted with such a line. (See paragraph 4.4.5 of the revised COW Specifications contained in [resolution A.446\(XI\)](#) as amended by the Organization by [resolutions A.497\(XII\)](#) and [A.897\(21\)](#)).

61.2 Connection of the small diameter line to the manifold valve

The phrase "connected outboard of" with respect to the small diameter line for discharge ashore should be interpreted to mean a connection on the downstream side of the tanker's deck manifold valves, both port and starboard, when the cargo is being discharged. This arrangement would permit drainage back from the tanker's cargo lines to be pumped ashore with the tanker's manifold valves closed through the same connections as for main cargo lines (see the sketch shown in appendix 3).

62 Part flow system specifications

Reg. 30.6.5.2

The Specifications for the Design, Installation and Operation of a Part Flow System for Control of Overboard Discharges referred to in regulation 30.6.5.2 is set out in appendix 4.

63 Examples of positive means

Reg. 30.7

Examples of positive means may take the form of blanks, spectacle blanks, pipeline blinds, evacuation or vacuum systems, or air or water pressure systems. In the event that the evacuation or vacuum systems, or air or water pressure systems are used, then these systems are to be equipped with both a pressure gauge and alarm system to enable the continuous monitoring of the status of the pipeline section, and thereby the valve integrity, between the sea chest and inboard valves.

64 Total quantity of discharge

Reg. 34.1.5

The phrase "the total quantity of the particular cargo of which the residue formed a part" in regulation 34.1.5 relates to the total quantity of the particular cargo which was carried on the previous voyage and should not be construed as relating only to the total quantity of cargo which was contained in the cargo tanks into which water ballast was subsequently loaded.

65 Shipboard oil pollution emergency plan

Reg. 37.1

Equivalent provision for application of requirement for oil pollution emergency plans

Any fixed or floating drilling rig or other offshore installation when engaged in the exploration, exploitation or associated offshore processing of sea-bed mineral resources, which has an oil pollution emergency plan co-ordinated with, and approved in accordance with procedures established by, the coastal State, should be regarded as complying with regulation 37.

66 Adequate reception facilities for substances regulated by regulation 2.4

Reg. 38

Unloading ports receiving substances regulated by regulation 2.4 (which include inter alia high-density oils) should have adequate facilities

dedicated for such products, allowing the entire tank-cleaning operation to be carried out in the port, and should have adequate reception facilities for the proper discharge and reception of cargo residues and solvent necessary for the cleaning operation in accordance with paragraph 9.2 of the Unified Interpretations.

67 Requirements for fixed or floating platforms

Reg. 39 Art. 2(3)(b)(ii)

Application of MARPOL

There are five categories of discharges that may be associated with the operation of fixed or floating platforms covered by this regulation when engaged in the exploration and exploitation of mineral resources, i.e.:

- .1 machinery space drainage;
- .2 offshore processing drainage;
- .3 production water discharge;
- .4 displacement water discharge; and
- .5 contaminated sea water from operational purposes such as produced oil tank cleaning water, produced oil tank hydrostatic testing water, water from ballasting of produced oil tank to carry out inspection by rafting.

Only the discharge of machinery space drainage and contaminated ballast should be subject to MARPOL (see diagram shown in appendix 5).