Sjøfartsdirektoratet
Norwegian Maritime Authority

Circular - Series R

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Regulation concerning amendments to the Regulations on environmental safety for ships and mobile offshore units in connection with the implementation of IMO Resolution MEPC.385(81) concerning amendments to MARPOL Annex VI

Introduction
The Norwegian Maritime Authority (NMA) has laid down amendments to the Regulations of 30 May 2012 No. 488 on environmental safety for ships and mobile offshore units (Environmental Safety Regulations).

The amendments implement in Norwegian legislation the changes to MARPOL Annex VI adopted through IMO Resolution MEPC.385(81).

The changes resulting from Resolution MSC.539(81) will enter into force on 1 August 2025.

Consultation
The proposed amendments to the Environmental Safety Regulations were circulated for comments in the period from 4 April to 1 August 2025. The NMA received responses from the Ministry of Justice and Public Security and the Norwegian Union of Marine Engineers. Both responses contained no comments on the proposed amendments.

Background for the amendments
On 24 March 2024, the IMO's Maritime Environment Protection Committee (MEPC) adopted amendments to Annex VI of the International Convention for the Prevention of Pollution from Ships (MARPOL) through Resolution MEPC.381(81). Norway developed its position in collaboration with the industry and participated in the negotiations. The industry has been informed of these amendments through special interest organisations and the NMA.

Resolution MEPC.358(81) introduces amendments to MARPOL Annex VI concerning, among other things, low-flashpoint fuels, fuel oil, replacement of steam systems with diesel engines, data availability, and the inclusion of transport work data and increased detail in the *IMO Ship Fuel Consumption Database* (IMO DCS).

The resolution includes amendments to MARPOL regulations VI/2.1.14, VI/2.1.33, VI/13.2.2, VI/14, VI/18, VI/27, VI/Appendix 1 and VI/Appendix IX.

In line with current practice, a Norwegian translation of the latest consolidated version of MARPOL Annex VI will also be made known.

Details on the amendments to MARPOL
Resolution MEPC.385(81)

MARPOL Annex VI has been incorporated into Norwegian legislation through section 12 of the Environmental Safety Regulations. The amendments are therefore included by reference to the resolution in section 12 of the Environmental Safety Regulations.

Additional regulatory changes related to fuel suppliers may also follow as a result of the resolution.

MARPOL regulation VI/2.1.14

The provisions in MARPOL regulation VI/2.1 contain key definitions of terms used in Annex VI. Regulation VI/2.1.14 introduces changes to the definition of the term *fuel oil*. According to the amended definition, *fuel oil* means: "...any fuel delivered to and intended for combustion purposes for propulsion or operation on board a ship, including gas, distillate and residual fuels."

The amendment broadens the understanding of the term *fuel oil*. Until now, the definition of *fuel oil* has been limited to combustion processes onboard ships. With the expanded definition, fuel used in fuel cells will also be covered by the term *fuel oil*: "Fuel oil means any fuel delivered to and intended for use onboard a ship."

MARPOL regulation VI/2.1.33

MARPOL regulation VI/2.1 previously did not include a definition of the term *gas fuel*. A new provision has now been added as regulation VI/2.1.33, defining the term. According to the new definition, *gas fuel* means: "a fuel oil with a vapour pressure exceeding 0.28 MPa absolute at a temperature of 37.8°C.*"

The asterisk refers to paragraph 2.2.18 of the International Code of Safety for Ships Using Gases or Other Low-flashpoint Fuels (IGF Code). The purpose of this reference is to show that the definition of *gas fuel* introduced in regulation VI/2.1.33 is harmonised with the definition in the IGF Code.

MARPOL regulation VI/13.2.2.

The provisions in MARPOL regulation VI/13 concern nitrogen oxides (NO_x). Regulation VI/13.2.2 specifies the requirements applicable in the case of a major conversion involving the replacement of a marine diesel engine with a non-identical diesel engine, or the installation of an additional diesel engine.

The regulation has now been amended to clarify that the installation of a diesel engine replacing a steam system is also considered a replacement engine. This change allows for the possibility of exempting the replacement engine from Tier III NO_x requirements, if it is not feasible to install a Tier III-compliant engine due to space constraints onboard the ship.

MARPOL regulation VI/14.12

The provisions in MARPOL regulation VI/14 concern sulphur oxides (SO_x) and particulate matter. Regulations VI/14.10, VI/14.11, VI/14.12 and VI/14.13 set out the requirements for fuel oil sampling points for fuel use onboard ships. Regulations VI/14.12 previously exempted fuel oil service systems for low-flashpoint fuels intended for combustion for propulsion or onboard use from the sampling point requirement.

Regulation VI/14.12 has now been amended to extend the exemption to fuel oil systems for low-flashpoint fuels and gas fuels.

MARPOL regulations VI/18.3, VI/18.3.2, VI/18.4, VI/18.5.1, VI/18.5.2, and VI/18.9.2

The provisions in regulation VI/18 concerning the availability and quality of fuel oil. As a consequence of the revised definition of *fuel oil* in regulation VI/2.1.14, minor adjustments have been made to the introductory text of regulations VI/18.3 and VI/18.3.2. Specifically, the words *"for combustion purposes"* have been removed from the opening lines of both provisions.

The amendment to regulation VI/18.4 clarifies that regulations VI/5.1, VI/8.1, and VI/8.2 no longer apply to fuel oil systems for low-flashpoint fuels or gas fuels.

Regulation VI/18.5 previously set out the requirements for bunker delivery notes (BDNs) for fuel oil intended for combustion. Due to the need for separate BDNs for conventional fuel oil and for low-flashpoint or gas fuels, regulation VI/18.5 has now been replaced by:

Regulation VI/18.5.1, which specifies the requirements for BDNs for conventional fuel oil, and Regulation VI/18.5.2, which specifies the requirements for BDNs for low-flashpoint or gas fuels.

Regulation VI/18.9.2 requires that authorities in Norway must ensure that local fuel suppliers provide the bunker delivery note and the sample required under regulation 18m along with a confirmation from the fuel oil supplier that the fuel oil complies with the requirements of regulations 14 and 18 of MARPOL Annex VI.

Regulation VI/18.9.2 has now been amended to require that local suppliers must provide the bunker delivery note and, where applicable, the "MARPOL delivered sample", together with confirmation that the fuel oil meets the requirements of regulations 14 and 18. The amendment introduces the new term "MARPOL delivered sample", and clarifies that this requirement does not apply to deliveries of low-flashpoint or gas fuels.

MARPOL regulations VI/27.14 and VI/27.15

MARPOL regulation VI/27 concerns the collection and reporting of data on ships' fuel oil consumption. Amendments to regulation 27 were made to relax the requirements for keeping reported data anonymised and confidential. As a result, two new provisions have been added following existing regulation VI/27.13: Regulation VI/27.14 allows the IMO to share fuel consumption data under certain conditions. Regulation VI/27.15 gives the IMO the authority, upon request from a shipowner, to make non-anonymised fuel consumption reports for the owner's own ships available to the public.

MARPOL Annex VI – Appendix I/2.3. 5

Appendix I of MARPOL Annex VI contains the template for the International Air Pollution Prevention Certificate (IAPP). Amendments have been made to the IAPP certificate to align it with other changes in MARPOL related to low-flashpoint fuels and gas fuels.

MARPOL Annex VI – Appendix IX

Appendix IX is the reporting format for fuel oil consumption data that must be submitted by the Norwegian Maritime Authority to the IMO database under regulation 27. The amendments to Appendix IX introduce new reporting requirements, including transport work (e.g. cargo carried x distance), fuel oil consumption by consumer type (main engine, auxiliary engine, boiler, etc.), fuel oil consumption while the ship is not underway, use of shore power. These changes aim to increase the level of detail in the *IMO Ship Fuel Consumption Database (IMO DCS)*.

MEPC 82 approved MEPC.1/Circ.913, titled "Guidance on the application of the amendments to appendix IX of MARPOL Annex VI adopted by resolution MEPC.385(81) on inclusion of data on transport work and enhanced granularity in the IMOCS Ship Fuel Database)". Norway has decided to implement the reporting requirements as of 1 August 2025. According to the guidelines in MEPC.1/Circ.913, reporting of the new data shall then, in line with the guidance, commence on 1 January 2026. Norway has chosen to follow the recommendations in the guidelines on this point, and reporting of the new data will therefore begin on 1 January 2026.

Administrative and financial implications

According to the NMA's assessment, the implementation of resolution MEPC.385(81) will only lead to minor economic and administrative consequences for the industry and the authorities.

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Attachments:
Regulation concerning amendments to the Regulations on environmental safety for ships and mobile offshore units
Resolution MEPC.385(81)

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