

Summary of new IMO requirements coming into force in 2022

Sr. No	Convention/Regulation	Resolution	New Ship			Existing Ship			Subject
			Ship type	Size	Compliance date	Ship type	Size	Compliance date	
1	MARPOL Annex VI	MEPC.324(75)	All	All	1 April 2022	All	All	The first renewal survey on or after 1 April 2023	<p>Sampling of fuel oil used onboard:</p> <p>The amendment introduced two new fuel oil samples for confirming compliance with MARPOL Annex VI sulphur requirements and the carriage ban for fuel oil with a sulphur content exceeding 0.50%, namely the “in-use” sample drawn from the fuel oil system representing the fuel in use, and the “on-board” sample representing fuel intended to be used and carried in the fuel oil storage tanks.</p> <p>The amendments consist of the following;</p> <p>a. MARPOL Annex VI, Reg.2 – a new definition in regulation 2 on low flashpoint fuel, for which sampling points will be exempted.</p> <p>b. MARPOL Annex VI, Reg.14 – Requirements on sampling points. This applies to both new ships (constructed after entry into force) and existing ships (first renewal survey 12 months or later, after entry into force).</p> <p>Amendments to Regulation 14 to add new paragraphs related to in-use and onboard fuel oil sampling and testing, to add new paragraphs to require one or more sampling points to be fitted or designated for the purpose of taking representative samples of the fuel oil being used or carried for use on board the ship. The representative samples of the fuel oil being used on board are to be taken in order to verify the fuel oil complies with the regulation.</p> <p>Reference is made to the Guidelines for onboard sampling for the verification of the sulphur content of the fuel oil used on board ships (Circular MEPC.1/Circ.864).</p> <p>c. Supplement to the International Air Pollution Prevention (IAPP) certificate is also amended to add a reference to sampling points and also to note where there is an exemption to the provision for low-flashpoint fuel.</p> <p>d. Appendix VI on the Fuel verification procedure for MARPOL Annex VI fuel oil samples was also revised to cover verification of the representative samples of “in use fuel oil” and “on board fuel oil”. A new Part 2 is added to Appendix VI of MARPOL Annex VI giving the verification procedure for the new “in-use” and “onboard” samples. To avoid ships being unjustly fined for marginal excess in sulphur content beyond their control, as opposed to the verification procedure in Part 1 for the MARPOL-delivered sample taken during bunkering, a 95% confidential interval has been given. This implies that a sulphur content of up to 0.53% may be accepted as compliant when testing the “in-use” and “on-board” samples.</p>

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2	MARPOL Annex VI	MEPC.324(75)	Container ships, Gas carriers, General Cargo ships, LNG carriers and Cruise Passenger ships	400 GT and over	Ships contracted for construction on or after 1 April 2022	-	-	-	<p>Strengthening of EEDI phase 3 requirements and Reference line for large bulk carriers:</p> <p>A. Amendments to MARPOL Annex VI to strengthen the EEDI phase 3 requirements were adopted as follows:</p> <ul style="list-style-type: none"> ➤ For general cargo ships, LNG carriers and cruise passenger ships, the effective date is moved forward from 2025 to 2022 with the reduction rate of 30%; ➤ For containerships, the effective date is moved forward from 2025 to 2022 and the reduction rate is strengthened based on the ship sizes; ➤ For gas carriers (e.g. LPG carriers) with 15,000DWT and above, the effective date is moved forward from 2025 to 2022 with the reduction rate of 30%. For gas carriers (e.g. LPG carriers) below 15,000DWT, the current effective date of 2025 and the reduction rate are retained; ➤ For ship types other than the above, the current effective date of 2025 and the reduction rate are retained. <p>B. Adjustment of the reference line for very large bulk carriers - Recognizing that EEDI requirements for very large bulk carriers as being too stringent, the amendments to MARPOL Annex VI to adjust the reference line for very large bulk carriers more than 279,000DWT were adopted.</p>
3	IMDG Code	MSC.477(102)	Ships carrying IMDG cargo	All	1 June 2022 Administration s may apply it on a voluntary basis as from 1 January 2021.	Ships carrying IMDG cargo	All	1 June 2022 Administration s may apply it on a voluntary basis as from 1 January 2021.	<p>Amendments to IMDG Code:</p> <p>The IMDG Code is regularly reviewed to take into account new requirements for existing substances or new substances.</p> <p>In addition to the regular updates to classification, segregation, packing and markings of dangerous goods, Amendment 40-20 includes;</p> <ul style="list-style-type: none"> • Segregation requirements for alcoholates • Amendments to SG 53 and SG 48 regarding liquid organic substances • Amendments to UN 1362 PG II and UN 1362 to clarify the differences between carbon-related substances particularly with regard to charcoal • A new special provision and handling code for medical waste <p>Amendments have also been made to the footnotes in the IMDG Code. Several footnotes in the IMDG Code were found to use mandatory language. These have now been included in the main body of the Code.</p>

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4	BWM Convention	MEPC.325(75)	All	All	1 June 2022	All	All	1 June 2022	<p>Sampling and Analysis at Commissioning of Ballast Water Management System (BWMS):</p> <p>MEPC 75 adopted amendments to BWMC regarding commissioning testing of ballast water management systems (Regulation E-1) and the form of the International Ballast Water Management Certificate (Appendix I).</p> <p>Consequently, revised Guidance for the commissioning testing of ballast water management systems was approved and available as BMW.2/Circ.70/Rev.1</p> <p>The commissioning testing is carried out to confirm that the system's method of treatment is effective in the installed configuration and is to be conducted by an accredited entity which is independent from the BWMS manufacturer or supplier and one that is approved by the flag Administration or the Recognized Organization working on its behalf.</p> <p>Although mandatory commissioning testing of BWMS during installation surveys comes into force from 1 June 2022, individual flag Administrations may enforce early implementation.</p>
5	<p>III 7 finalized the 2021 HSSC survey guidelines with the inclusion of new requirements that have been adopted since III 6 and that are due to enter into force up to and including 31 December 2021.</p> <p>The revised guidelines include amendments to SOLAS which entered into force 1 January 2020, including (but not limited to);</p> <ul style="list-style-type: none"> a. Operational readiness, maintenance and inspections for lifeboats and rescue boats, launching appliances and release gear; means of escape (requirements for evacuation analysis for passenger ships; helicopter facilities (MSC404 (96)). b. Harmonization of survey periods of cargo ships not subjected to the ESP Code (MSC. 409 (97)). c. Intact stability (MSC. 421 (98)). d. Flooding detection systems for passenger ships carrying 36 or more persons constructed on or after 1 July 2010 (MSC. 421(98)). e. Requirements for vehicle carriers carrying motor vehicles with compressed hydrogen or natural gas in their tanks for their own propulsion as cargo (MSC. 421 (98)). <p>The revised HSSC Survey Guidelines will go to IMO Assembly 32 (December 21) for adoption and are expected to enter into force 1 January 2022.</p>								