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Circular Letter 001/2022

Date: 03.01.2022

Attn.: Authorized Surveyors, Ship Owner, Ship operators

Subject: MARPOL 73, ANNEX VI, (Procedures for sampling and verification of the Sulphur content of fuel oil and the Energy Efficiency Design Index (EEDI)).

In accordance with IMO Resolution MEPC.324(75) amendments to MARPOL 73, ANNEX VI, Procedures for sampling and verification of the Sulphur content of fuel oil and the Energy Efficiency Design Index (EEDI), is entering into the force from the 1st of April 2022.

Every ship should be in compliance to Procedures for sampling and verification of the Sulphur content of fuel oil and the Energy Efficiency Design Index (EEDI).

For a ship constructed before 1 April 2022, the sampling point(s) referred to in paragraph 10 shall be fitted or designated not later than the first renewal survey as identified in regulation 5.1.2 of Annex VI on or after 1 April 2023.

Kindly find below applicable requirement:

Regulation 2

Definitions

- *Sulphur content of fuel oil* means the concentration of sulphur in a fuel oil, measured in %m/m as tested in accordance with a standard acceptable to the Organization¹;
- *Low-flashpoint fuel* means gaseous or liquid fuel oil having a flashpoint lower than otherwise permitted under paragraph 2.1.1 of regulation 4 of chapter II-2 of the International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended.
- *MARPOL delivered sample* means the sample of fuel oil delivered in accordance with regulation 18.8.1 of this Annex.
- *In-use sample* means a sample of fuel oil in use on a ship.
- *Onboard sample* means a sample of fuel oil intended to be used or carried for use on board that ship.

¹ Refer to ISO 8754:2003 Petroleum products—Determination of sulphur content—Energy-dispersive X-ray fluorescence spectrometry.

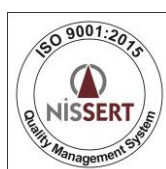
Regulation 14

Sulphur oxides (SOX) and particulate matter

New paragraphs 8 to 13 and associated headings are inserted after existing paragraph 7 as follows:

In-use and onboard fuel oil sampling and testing

8. If the competent authority of a Party requires the in-use or onboard sample to be analyzed, it shall be done in accordance with the verification procedure set forth in appendix VI to this Annex to determine whether the fuel oil being used or carried for use on board meets the requirements in paragraph 1 or paragraph 4 of this regulation. The in-use sample shall be drawn taking into account the guidelines developed by the Organization². The onboard sample shall be drawn taking into account the guidelines developed by the Organization³.



9. The sample shall be sealed by the representative of the competent authority with a unique means of identification installed in the presence of the ship's representative. The ship shall be given the option of retaining a duplicate sample.

In-use fuel oil sampling point

10. For each ship subject to regulations 5 and 6 of this Annex, sampling point(s) shall be fitted or designated for the purpose of taking representative samples of the fuel oil being used on board the ship taking into account the guidelines developed by the Organization².

11. For a ship constructed before 1 April 2022, the sampling point(s) referred to in paragraph 10 shall be fitted or designated not later than the first renewal survey as identified in regulation 5.1.2 of this Annex on or after 1 April 2023.

12. The requirements of paragraphs 10 and 11 above are not applicable to a fuel oil service system for a low-flashpoint fuel for combustion purposes for propulsion or operation on board the ship.

13. The competent authority of a Party shall, as appropriate, utilize the sampling point(s) which is(are) fitted or designated for the purpose of taking representative sample(s) of the fuel oil being used onboard in order to verify that the fuel oil complies with this regulation. Taking fuel oil samples by the competent authority of the Party shall be performed as expeditiously as possible without causing the ship to be unduly delayed.

Regulation 18

Fuel oil availability and quality

Paragraph 8.2 is replaced by the following:

8.2 If a Party requires the representative sample to be analyzed, it shall be done in accordance with the verification procedure set forth in appendix VI to this Annex to determine whether the fuel oil meets the requirements of this Annex.

Regulation 20

Attained Energy Efficiency Design Index (attained EEDI)

A new paragraph 3 is added after existing paragraph 2, as follows:

3. For each ship subject to regulation 21 of this Annex, the Administration or any organization duly authorized by it shall report to the Organization the required and attained EEDI values and relevant information, taking into account the guidelines developed by the Organization⁴, via electronic communication:

- .1. within 7 months of completing the survey required under regulation 5.4 of this Annex; or
- .2. within 7 months following 1 April 2022 for a ship delivered prior to 1 April 2022.

²Refer to the 2019 Guidelines for on board sampling for the verification of the Sulphur content of the fuel oil used on board ships (MEPC.1/Circ.864/Rev.1).

³Refer to the 2020 Guidelines for onboard sampling of fuel oil intended to be used or carried for use on board ship (MEPC.1/Circ.889).

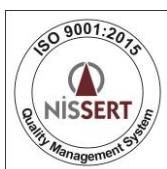
⁴Refer to the 2018 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships (resolution MEPC.308(73)), as amended by the Organization.



Regulation 21
Required EEDI

The existing table 1 (Reduction factors (in percentage) for the EEDI relative to the EEDI reference line) and the associated footnotes are replaced by the following:

Ship Type	Size	Phase 0 1 Jan 2013 – 31 Dec 2014	Phase 1 1 Jan 2015 – 31 Dec 2019	Phase 2 1 Jan 2020 – 31 Mar 2022	Phase 2 1 Jan 2020 – 31 Dec 2024	Phase 3 1 Apr 2022 and onwards	Phase 3 1 Jan 2025 and onwards
Bulk carrier	20,000 DWT and above	0	10		20		30
	10,000 and above but less than 20,000 DWT	n/a	0-10*		0-20*		0-30*
Gas carrier	15,000 DWT and above	0	10	20		30	
	10,000 and above but less than 15,000 DWT	0	10		20		30
	2,000 and above but less than 10,000 DWT	n/a	0-10*		0-20*		0-30*
Tanker	20,000 DWT and above	0	10		20		30
	4,000 and above but less than 20,000 DWT	n/a	0-10*		0-20*		0-30*
Containership	200,000 DWT and above	0	10	20		50	
	120,000 and above but less than 200,000 DWT	0	10	20		45	
	80,000 and above but less than 120,000 DWT	0	10	20		40	
	40,000 and above but less than 80,000 DWT	0	10	20		35	
	15,000 and above but less than 40,000 DWT	0	10	20		30	



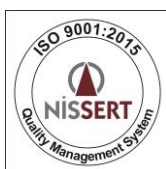
Ship Type	Size	Phase 0 1 Jan 2013 – 31 Dec 2014	Phase 1 1 Jan 2015 – 31 Dec 2019	Phase 2 1 Jan 2020 – 31 Mar 2022	Phase 2 1 Jan 2020 – 31 Dec 2024	Phase 3 1 Apr 2022 and onwards	Phase 3 1 Jan 2025 and onwards
	10,000 and above but less than 15,000 DWT	n/a	0-10*	0-20*		15-30*	
General Cargo ships	15,000 DWT and above	0	10	15		30	
	3,000 and above but less than 15,000 DWT	n/a	0-10*	0-15*		0-30*	
Refrigerated cargo carrier	5,000 DWT and above	0	10		15		30
	3,000 and above but less than 5,000 DWT	n/a	0-10*		0-15*		0-30*
Combination carrier	20,000 DWT and above	0	10		20		30
	4,000 and above but less than 20,000 DWT	n/a	0-10*		0-20*		0-30*
LNG carrier***	10,000 DWT and above	n/a	10**	20		30	
Ro-ro cargo ship (vehicle carrier)***	10,000 DWT and above	n/a	5**		15		30
Ro-ro cargo ship***	2,000 DWT and above	n/a	5**		20		30
	1,000 and above but less than 2,000 DWT	n/a	0-5**,**		0-20*		0-30*
Ro-ro passenger ship***	1,000 DWT and above	n/a	5**		20		30
	250 and above but less than 1,000 DWT	n/a	0-5**,**		0-20*		0-30*
Cruise passenger ship*** having non-conventional propulsion	85,000 GT and above	n/a	5**	20		30	
	25,000 and above but less than 85,000 GT	n/a	0-5**,**	0-20*		0-30*	

* Reduction factor to be linearly interpolated between the two values dependent upon ship size. The lower value of the reduction factor is to be applied to the smaller ship size.

** Phase 1 commences for those ships on 1 September 2015.

*** Reduction factor applies to those ships delivered on or after 1 September 2019, as defined in paragraph 43 of regulation 2.

Note: n/a means that no required EEDI applies."



In table 2 (Parameters for determination of reference values for the different ship types), the first row corresponding to Ship type defined in regulation 2.25 is replaced by the following:

"2.25 Bulk carrier	961.79	DWT of the ship where $DWT \leq 279,000$ 279,000 where $DWT > 279,000$	0.477"
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Kindly be guided accordingly.
Yours faithfully.

Kristina Melikyan
Chief Executive Officer
Veritas Register of Shipping Ltd.

