INTERNATIONAL MARITIME ORGANIZATION

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CONSIDERATION AND ADOPTION OF AMENDMENTS TO MANDATORY INSTRUMENTS

Proposed editorial modifications to the draft amendments to MARPOL Annex VI as set out in document MEPC 85/3/1

Submitted by Norway and IACS

SUMMARY	
Executive summary:	This document proposes editorial modifications to the draft amendments to MARPOL Annex VI as set out in document MEPC 85/3/1, to improve clarity regarding the application of the requirements.
Strategic direction, if applicable:	3
Output:	3.2
Action to be taken:	Paragraph 9
Related documents:	MEPC 85/3/1, MEPC 85/3/9; SSE 11/19/3 and PPR 13/17/2

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5/Rev.7), and comments on document MEPC 85/3/1 containing amendments to MARPOL Annex VI on installation of pressure/vacuum devices on tankers carrying crude oil.

2 At PPR 11, following considerations of document PPR 11/17/2 (Norway), the Sub-Committee invited the SSE Sub-Committee to consider a requirement for new crude oil tankers to be fitted with pressure-vacuum P/V valves with an opening pressure of a minimum 0.20 bar and identify any negative implications.

3 Following consideration of documents PPR 11/17/2 and SSE 11/19/3 (Norway) during SSE 11, the Sub-Committee concluded that a requirement of a 0.20 bar minimum opening pressure for P/V valves would not have any negative safety implications and referred document SSE 11/19/3 to PPR 13 for further consideration.

4 At PPR 13, following consideration of documents PPR 13/17/2 and SSE 11/19/3, the Sub-Committee agreed to draft amendments to regulation 15 of MARPOL Annex VI, on volatile organic compounds. The draft amendments were considered and approved

at MEPC 84 and those draft amendments, as set out in document MEPC 85/3/1, will be considered for adoption at this session.

Editorial modifications to draft amendments to regulation 15 and appendix I of MARPOL Annex VI

5 In document MEPC 85/3/9, Japan notes the need for additional clarification with regard to the draft amendments to regulation 15 and suggests referring to "venting arrangements" in draft regulation 15.8 instead of "pressure/vacuum devices" to align the text with the term used in SOLAS regulation II-2/11.6.1.

6 The co-sponsors agree with Japan that the text in draft regulation 15.8 should be clarified. However, the term "venting arrangements may create uncertainty as to which components of the venting system are required to comply with the minimum opening pressure of 0.20 bar gauge. The term "venting arrangements" used in SOLAS regulation II-2/11.6.1 is broader than pressure/vacuum valves intended for small flows caused by thermal variations; it also covers arrangements for large flows during cargo loading, ballasting or discharging. Consequently, the use of that term could lead to inconsistent interpretations by Administrations, recognized organizations and industry.

7 The discussions in the PPR and SSE Sub-Committees have considered a requirement for pressure/vacuum valves, rather than "devices" or "arrangements". The co-sponsors are therefore of the view that draft regulation 15.8 should refer specifically to the minimum opening pressure of pressure/vacuum valves.

8 Proposed editorial modifications to the text of regulation 15 and appendix I of MARPOL Annex VI are set out in the annex to this document.

Action requested of the Committee

9 The Committee is invited to consider the proposal contained in this document and take action as appropriate.

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ANNEX

PROPOSED EDITORIAL MODIFICATIONS TO THE DRAFT AMENDMENTS TO MARPOL ANNEX VI AS SET OUT IN DOCUMENT MEPC 85/3/1

Regulation 15
Volatile organic compounds

"8 For a tanker carrying crude oil constructed on or after [1 July 2028], where pressure/vacuum valves ~~devices~~ are installed in accordance with regulation 11.6.1.1 of SOLAS chapter II-2, the pressure/vacuum valves ~~such devices~~ shall have an opening pressure of not less than 0.20 bar gauge."

Appendix I of MARPOL Annex VI
Form of International Air Pollution Prevention (IAPP) Certificate (regulation 8)

Supplement to International Air Pollution Prevention Certificate (IAPP Certificate)

"2.4.2.3 For a tanker carrying crude oil constructed on or after [1 July 2028], pressure/vacuum valves ~~devices~~ are fitted in accordance with regulation 15.8 ..... □"