



INSTRUCTIONS FOR THE GUIDANCE OF SURVEYORS ON

## **POLLUTION PREVENTION**

MSIS27.15

Rev 10.22



## **PREFACE**

- 0.1 These Marine Survey Instructions for the Guidance of Surveyors (MSIS) are not legal requirements in themselves. They may refer to statutory requirements elsewhere. They do represent the MCA policy for MCA surveyors to follow.
- 0.2 If for reasons of practicality, for instance, these cannot be followed then the surveyor must seek at least an equivalent arrangement, based on information from the owner/operator. Whenever possible guidance should be sought from either Principal Consultant Surveyors or Survey Operation Branch, in order to maintain consistency between Marine Offices.

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## RECENT AMENDMENTS

The amendments made in the most recent publication are shown below, amendments made in previous publications are shown in the document Amendment History.

Version Number	Status / Change	Date	Author Reviewer	Content Approver	Next Review Date/Expiry Date
10.22	<ul style="list-style-type: none"> <li>Update MARPOL references</li> <li>Reference that MCA will accept vessels derated to less than 130kW provided they comply with the requirements of MGN435</li> </ul>	10.22	D Fenner	G Stone	10.24

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## **POLLUTION PREVENTION ARRANGEMENTS**

### **15.1 GENERAL**

15.1.1 The regulations for control of marine pollution mainly stem from the international MARPOL Convention. In general all vessels, including fishing vessels, are subject to the same survey and operational requirements. The Survey and Certification Instructions (MSIS 23) contain more guidance on survey periods and forms.

15.1.2 MARPOL currently consists of 6 Annexes, each of which addresses a specific pollution threat, with 2 more annexes proposed but as yet not ratified by sufficient countries to enter into force world wide.

### **15.2 MARPOL ANNEX I - OIL**

15.2.1 [The Merchant Shipping \(Prevention of Oil Pollution\) Regulations, SI 2019 No 42](#), apply to fishing vessels.

15.2.2 Ships over 400 GT require survey for the issue of an International Oil Pollution Prevention (IOPP) Certificate or, if they do not go outside UK waters, a United Kingdom Oil Pollution Prevention (UKOPP) Certificate. The UKOPP certificate does not need annual surveys.

15.2.3 For vessels which are classed re-surveys have been delegated to the UK recognised class societies. Initial surveys have also been delegated to some societies and the Class agreements, held on the Survey Branch microsite, may need to be consulted to confirm delegation status.

15.2.4 Where ships are subject to MCA OPP survey instructions are available in 'The Prevention of Oil Pollution from Ships' (MSIS 6)

15.2.5 The MCA has not delegated the approval of the Shipboard Oil Pollution Emergency Plans (SOPEPs). These should be approved in accordance with IMO Resolution MEPC.85(44).

15.2.6 Fishing vessels of under 400 GT are not required to be surveyed but must comply with the Prevention of Oil Pollution Regulations. The UK is now surrounded by the MARPOL Annex I 'North West European waters special area', where the discharge of any bilge water into the sea is prohibited unless oil content is less than 15 ppm, and most fishing vessels will be affected by this. It is considered that oil content under 15 ppm cannot be guaranteed unless an approved Oily Water Separator is used, although no monitor or auto stop devices are necessary, or oily bilge water is discharged ashore to reception facilities.

15.2.7 Vessels which have any tanks which hold in excess of 5 tons of oil are required by the [Oil in Navigable Waters \(Transfer Records\) Regulations, SI 1957 No 358](#) to maintain records of oil transfers. Records in a normal oil record book would fulfil this function, although the regulations permit alternative means.

## 15.3 MARPOL ANNEX II – NOXIOUS LIQUIDS

- 15.3.1 This covers the carriage of noxious liquids in bulk. On fishing vessels this likely to apply only when bulk fish oil is carried, which is pollution category Y. In these cases the [Merchant Shipping \(Prevention of Pollution from Noxious Liquid Substances in Bulk\) Regulations, SI 2018 No 68](#), as amended by [The Merchant Shipping \(Port State Control and Prevention of Pollution from Noxious Liquid Substances in Bulk\) Regulations SI 2020 No. 496](#) and [The Merchant Shipping \(Port State Control and Prevention of Pollution from Noxious Liquid Substances in Bulk\) Regulations SI 2021 818](#) No will require that the ship is surveyed for issue of an International Noxious Liquid Substances (INLS) certificate.
- 15.3.2 It is recommended that advice on these surveys be obtained from HQ before commencement due to the rarity of these surveys and the recent changes to MARPOL Annex II.
- 15.3.3 Guidance on survey for INLS can be found in 'Survey of Chemical Tankers' (MSIS 20). Guidance on approval of the associated Procedures and Arrangements manuals is contained in procedure MCA 292 and chapter 10 of the 'Survey and Certification' Instructions (MSIS 23).

## 15.4 MARPOL ANNEX III – PACKAGED DANGEROUS GOODS

- 15.4.1 These regulations currently only apply to goods as cargo. Any fishing vessel found to be transporting cargo would need to obtain full cargo ship certification.

## 15.5 MARPOL ANNEX IV - SEWAGE

- 15.5.1 [The Merchant Shipping \(Prevention of Pollution by Sewage from Ships\) Regulations, SI 2020 No 620](#), applies to fishing vessels of 400 GT and over or that carry 15 persons and over.
- 15.5.2 Survey for International Sewage Pollution Prevention Certificate has been delegated to classification societies. Where MCA survey is requested Environmental Quality Branch should be contacted for advice on UK implementation.

## 15.6 MARPOL ANNEX V - GARBAGE

- 15.6.1 [The Merchant Shipping \(Prevention of Pollution by Garbage from Ships\) Regulations, SI 2020 No 621](#), apply to fishing vessels as they do to all other UK

ships. No survey or certification is required but records of garbage must be kept in a Garbage Record Book.

15.6.2 More strict disposal requirements apply in MARPOL Annex V 'special areas', of which the 'North Sea' is one.

15.6.3 Ships of 400 GT and above or with 15 or more persons onboard are required to have garbage management plans but these do not need approval.

15.6.4 Every ship of 12 m or more in length shall display placards informing the crew and passengers of the disposal requirements of garbage under these regulations

15.6.5 Further guidance is contained in 'The Prevention of Pollution by Garbage from Ships and The Provision and Use of Port Waste Reception Facilities' (MSIS 7).

## 15.7 MARPOL ANNEX VI - AIR

15.7.1 The revised MARPOL Annex VI adopted by resolution MEPC. 176(58) entered into force on 1 July 2010. The amendments thereto, adopted by resolutions MEPC.190(60), MEPC.194(61), MEPC.202(62), MEPC.203(62), MEPC.217(63), MEPC.247(66), MEPC.251(66), MEPC.258(67) and MEPC.324(75), have entered into force..

15.7.1 Every ship of 400 gross tonnage and above and every fixed and floating drilling rig and other platforms shall, to ensure compliance with the requirements of chapter 3 of Annex VI, be subject to the surveys specified in chapter 5 of Annex VI.

15.7.3 Survey for International Air Pollution Prevention Certificate has been delegated to classification societies. Where MCA survey is requested Environmental Quality Branch should be contacted for advice on UK implementation.

15.7.4 Guidance on survey of diesel engines is given in [MSN 1819](#) but the regulations also apply to boilers, incinerators and ozone depleting substances, including some fridge gases.

15.7.5 In accordance with MARPOL Annex VI, ships which operate in IMO designed NOx Emission Control Areas are required to have an engine which meets the IMO MARPOL Annex VI Tier III standard, except for vessels exempted by Annex VI Chapter 13.1.2. To meet this requirement, all Vessels which fit a newly manufactured engine of over 130kW must obtain a EIAPP Certificate and associated technical file. Further details can be found in [MSN 1819](#) The Merchant Shipping (Prevention of Air Pollution from Ships) Regulations 2008. For further details of requirements see the [Merchant Shipping \(Prevention of Air Pollution from Ships\) Regulations 2008](#) (S.I. 2008/2924). See also [MGN 647](#) - Alternative to the IMO MARPOL Annex VI Tier III Standard Engine.

15.7.6 Engines previously rated >130 kW where these are then derated using approved methods can be accepted. See [MGN435](#).

15.7.7 The 'North Sea' became a Sulphur Oxide Emission Control Area' (SECA) on 22 November 2007. Vessels must show that the fuel burnt in the SECA contains less than 1.5% sulphur. Where vessels use high sulphur fuel and change to low sulphur on entry to the SECA records of changeover will need to be kept. While a ship is operating within an emission control area, the sulphur content of fuel oil used on board that ship shall not exceed 0.10% m/m

## 15.8 ANTI FOULING

15.8.1 The International Convention on the Control of Harmful Anti-fouling Systems on Ships has not yet come into effect world wide but EU Regulation 782/2003 has made compliance with the convention compulsory for all EU registered ships.

15.8.2 The regulations banned the application of organotin compounds which act as biocides in anti-fouling systems to ships from 1 July 2003. Ships of 400 GT and over are required to be surveyed for the issue of an International Anti Fouling Certificate. This must be endorsed after every application of anti fouling.

15.8.3 Survey for International Anti Fouling Certificate has been delegated to classification societies. Where MCA survey is requested Environmental Quality Branch should be contacted for advice on UK implementation.

15.8.4 Owners of ships over 24m but under 400 GT must sign a Declaration on Anti Fouling Systems such as the specimen in the regulations.

## 15.9 BALLAST WATER

15.9.1 The International Convention for the Control and Management of Ships' Ballast Water and Sediments has not yet come into effect world wide but certain coastal states, including Brazil, have introduced regulations to prevent contamination of their waters by ballast.

15.9.2 The UK currently has no such legislation but compliance with IMO guidelines is recommended by MGN 81.

15.9.3 Survey for International Ballast Water Management Certificate has been delegated to classification societies. Where MCA survey is requested Environmental Quality Branch should be contacted for advice.