

# Unified Interpretation for MARPOL ANNEX VI (Energy Efficiency for Ships)

## Object of Amendment

Guidance for Marine Pollution Prevention Systems

## Reason for Amendment

In October 2012, the IMO Marine Environment Protection Committee (MEPC) approved some unified interpretations for MARPOL ANNEX VI as MEPC.1/Circ.795 and has continued to revise them ever since. At MEPC81 held in March 2024, a new definition was added for heavy load carriers that are exempt from the application of the EEDI, EEXI and CII as stipulated in MARPOL ANNEX VI. In addition, clarifications were made on the treatment of new ships of a type for which EEDI Phase 1 started on 1 September 2015, and a unified interpretation related to the above was approved as MEPC.1/Circ.795/Rev.9.

Furthermore, at MEPC82 held in October 2024, MEPC.1/Circ.913 was approved as a guidance on the handling of collected data for the fuel consumption database (IMO DCS) so that data collection can be unified throughout the calendar year when data collection items change during the calendar year.

Accordingly, relevant requirements are amended based on MEPC.1/Circ.795/Rev.9 and MEPC.1/Circ.913.

## Outline of Amendment

The main contents of this amendment are as follows:

- (1) Add new definition for the ship type “heavy load carrier” to clarify that such ships are not classified as “general cargo ships” and are not to subject to the EEDI, EEXI and CII.
- (2) Clarify that MEPC.1/Circ.795, which provides guidance for which new ships EEDI applies, also applies to ship types (Ro-Ro cargo ships, LNG carriers, etc.) for which the EEDI came into effect on 1 September 2015.
- (3) Clarify that MEPC.1/Circ.913 is to be followed to ensure uniform data collection during the calendar year even after the data items in the fuel consumption database (IMO DCS) are going to change from 1 August 2025 according to Resolution MEPC.385(81).

## Effective Date and Application

Effective date of this amendment is 1 July 2025.

ID:DD24-25

Amended-Original Requirements Comparison Table  
(Unified Interpretation for MARPOL ANNEX VI (Energy Efficiency for Ships))

Amended	Original	Remarks
<p><b>GUIDANCE FOR MARINE POLLUTION PREVENTION SYSTEMS</b></p> <p><b>Part 8 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS</b></p> <p><b>Chapter 3 ENERGY EFFICIENCY FOR SHIPS</b></p> <p><b>3.1 General</b></p> <p><b>3.1.4 Terminology</b> (<i>Regulation 2 of Annex VI</i>)</p> <p><b>1</b> (Omitted)</p> <p><b>2</b> (Omitted)</p> <p><b>3</b> <u>The wording “heavy load carriers” in 3.1.4(14), Part 8 of the Rules means as follows:</u></p> <p><u>(1) Ships falling under the any of the following.</u></p> <p><u>(a) heavy load deck carriers (ships, which do not feature a cargo hold and carry project cargo on a flat deck; not fitted with cargo coamings/chutes/tippers);</u></p> <p><u>(b) semi-submersible project cargo carriers;</u></p> <p><u>(c) semi-submersible heavy load deck carriers (including dock lift ships);</u></p> <p><u>(d) heavy lift multi-purpose ships;</u></p> <p><u>(e) premium project carriers; and</u></p> <p><u>(f) project cargo carriers.</u></p> <p><u>(2) The “heavy lift multi-purpose ships” and “premium project carriers” specified above in 1(d) and (e) are</u></p>	<p><b>GUIDANCE FOR MARINE POLLUTION PREVENTION SYSTEMS</b></p> <p><b>Part 8 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS</b></p> <p><b>Chapter 3 ENERGY EFFICIENCY FOR SHIPS</b></p> <p><b>3.1 General</b></p> <p><b>3.1.4 Terminology</b> (<i>Regulation 2 of Annex VI</i>)</p> <p><b>1</b> (Omitted)</p> <p><b>2</b> (Omitted)</p> <p>(Newly added)</p>	<p>MEPC.1/Circ.795 /Rev.9</p> <p>1 Definition of “heavy load carrier”</p> <p>Interpretation 1.1</p> <p>Interpretation 1.2</p>

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<p>to fulfil the adapted criterion of “ships engaged in lifting operations” as specified in <i>the International Code on Intact Stability, 2008 (2008 IS Code)</i>, as amended by resolution MSC.443(99), and comply as follows:</p> $SWL \times Outreach \geq 0.67 \times Displacement \times \left(\frac{D-T}{B}\right)$ <p><u>SWL</u> : Maximum safe working load of crane of one single crane (<i>t</i>);</p> <p><u>Outreach</u> : Outreach from turning axis of crane (<i>m</i>);</p> <p><u>Displacement</u> : Displacement of vessel at draft <i>T</i> (<i>t</i>);</p> <p><u>T</u> : Load line draught for summer freeboard (<i>m</i>)</p> <p><u>B</u> : Moulded breadth of the vessel measured amidships at draft <i>T</i> (<i>m</i>);</p> <p><u>D</u> : Depth of ships (<i>m</i>) as specified in 2.1.6, <b>Part A of Rules for the Survey and Construction of Steel Ships.</b></p> <p>(3) For the “project cargo carriers” specified in 1(f) above (either with or without cargo gear), the Administration may base its decision on a design and operation-specific application compiled by the owner/company.</p> <p><b>4</b> (Omitted)</p> <p><b>3.4 Required Energy Efficiency Design Index (Required EEDI)</b> (<i>Regulation 24 of Annex VI</i>)</p> <p><b>1</b> (Omitted)</p>	<p><b>3</b> (Omitted)</p> <p><b>3.4 Required Energy Efficiency Design Index (Required EEDI)</b> (<i>Regulation 24 of Annex VI</i>)</p> <p><b>1</b> (Omitted)</p>	<p>Interpretation 1.3</p>

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<p><b>2</b> In Table 8-8, Part 8 of the Rules, a “ship corresponding to Phase 1” refers to the following <b>(1)</b> or <b>(2)</b> new ships:</p> <p>(1) <u>ship types for which Phase 1 commences on 1 January 2015:</u></p> <p>(a) a ship for which the building contract is placed in Phase 1, and the delivery is before 1 January 2024; or</p> <p>(b) a ship for which the building contract is placed before 1 January 2015, and the delivery of which is on or after 1 January 2019 and before 1 January 2024; or</p> <p>(c) in the absence of a building contract, the ship referred to in the following <b>i)</b> or <b>ii)</b>:</p> <p><b>i)</b> a ship at beginning stage of construction on or after 1 July 2015 and before 1 July 2020, and the delivery of which is before 1 January 2024; or</p> <p><b>ii)</b> a ship at beginning stage of construction before 1 July 2015, and the delivery of which is on or after 1 January 2019 and before 1 January 2024.</p> <p>(2) <u>ship types for which Phase 1 commences on 1 September 2015:</u></p> <p>(a) <u>a ship for which the building contract is placed in Phase 1, and the delivery is before 1 January 2024; or</u></p> <p>(b) <u>a ship for which the building contract is placed before 1 September 2015, and the delivery of which is on or after 1 September 2019 and before 1 January 2024; or</u></p> <p>(c) in the absence of a building contract, the ship</p>	<p><b>2</b> In Table 8-8, Part 8 of the Rules, a “ship corresponding to Phase 1” refers to <u>the following new ships:</u></p> <p>(1) a ship for which the building contract is placed in Phase 1, and the delivery of which is before 1 January 2024; or</p> <p>(2) a ship for which the building contract is placed before 1 January 2015, and the delivery of which is on or after 1 January 2019 and before 1 January 2024; or</p> <p>(3) in the absence of a building contract, the ship referred to in the following <b>(a)</b> or <b>(b)</b>:</p> <p><b>(a)</b> a ship at beginning stage of construction on or after 1 July 2015 and before 1 July 2020, and the delivery of which is before 1 January 2024; or</p> <p><b>(b)</b> a ship at beginning stage of construction before 1 July 2015, and the delivery of which is on or after 1 January 2019 and before 1 January 2024.</p> <p>(Newly added)</p>	<p>MEPC.1/Circ.795 /Rev.9</p> <p>3 Definition of “new ship” for calculation of the required EEDI</p> <p>Interpretation 3.2.2.1</p> <p>Interpretation 3.2.2.2 Clarification regarding the treatment of new ships subject to Phase 1 from 1 September 2015.</p> <p>(Ro-Ro cargo ship, LNG carrier, etc.)</p>

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<p><u>referred to in the following i) or ii):</u></p> <p>i) <u>a ship at beginning stage of construction on or after 1 March 2016 and before 1 July 2020, and the delivery of which is before 1 January 2024; or</u></p> <p>ii) <u>a ship at beginning stage of construction before 1 March 2016, and the delivery of which is on or after 1 September 2019 and before 1 January 2024.</u></p> <p><b>3.8 Data Collection, Reporting and Retained related to Fuel Oil Consumption Reporting, etc.</b> <i>(Regulation 27 of Annex VI)</i></p> <p><u>1</u> (Omitted)</p> <p><u>2</u> The handling of “<u>portion thereof</u>” in <b>3.8-1(2)(a), Part 8 of the Rules</b> is to be in accordance with <i>MEPC.1/Circ.913</i>, as amended.</p> <p><u>3</u> (Omitted)</p> <p><u>4</u> (Omitted)</p> <p><u>5</u> (Omitted)</p>	<p><b>3.8 Data Collection, Reporting and Retained related to Fuel Oil Consumption Reporting, etc.</b> <i>(Regulation 27 of Annex VI)</i></p> <p><u>1</u> (Omitted) (Newly added)</p> <p><u>2</u> (Omitted)</p> <p><u>3</u> (Omitted)</p> <p><u>4</u> (Omitted)</p>	<p>MEPC.1/Circ.913</p> <p>In relation to the changes made to the data collection items for fuel consumption database (IMO DCS) in Resolution MEPC.385(81), guidance will be incorporated to enable uniform data collection and reporting over the calendar year.</p>

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EFFECTIVE DATE AND APPLICATION		
1. The effective date of this amendments is 1 July 2025.		

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