RUSSIAN MARITIME REGISTER OF SHIPPING

CIRCULAR LETTER **No. 313-04-1713c** dated 03.03.2022

Re:
amendments to the Rules for the Prevention of Pollution from Ships Intended for Operation in Sea Areas and Inland Waterways of the Russian Federation, 2022, ND No. 2-020101-163-E

Item(s) of supervision:
ships in construction and in service

Entry-into-force date:
01.04.2022

~~Cancels / amends / adds Circular Letter No.~~ ~~dated~~

Number of pages: 1 + 9

Appendices:
Appendix 1: information on amendments introduced by the Circular Letter
Appendix 2: text of amendments to Parts II "Ship's Construction, Equipment and Arrangements for the Prevention of Pollution by Oil" and VI "Ship's Equipment and Arrangements for the Prevention of Air Pollution" of the Rules

Director General Konstantin G. Palnikov

Text of CL:

We hereby inform that in connection with coming into force of IMO resolution MEPC.324(75) on 1 April 2022, as well as considering new revision of IMO circular MEPC.1/Circ.795/Rev.5 and the experience of technical supervision, the Rules for the Prevention of Pollution from Ships Intended for Operation in Sea Areas and Inland Waterways of the Russian Federation shall be amended, as specified in the Appendices to the Circular Letter.

It is necessary to do the following:

1. Bring the content of the Circular Letter to the notice of the RS surveyors, interested organizations and persons in the area of the RS Branch Offices' activity.
2. Apply the provisions of the Circular Letter during review and approval of the technical documentation on or after 1 April 2022.

List of the amended and/or introduced paras/chapters/sections:
Part II: paras 3.8.2, 4.2.14, 8.2.4, 8.2.5, 8.2.13, 8.3.6 and 11.2
Part VI: paras 1.2.1, 1.3.2.5, 2.2.4 – 2.2.14, 2.3.5 – 2.3.7, Table 2.6.5, paras 2.6.6 3 and 2.6.6.4, and Table 2.6.7

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Appendix 1 to Circular Letter
No. 313-04-1713c dated 03.03.2022

Information on amendments introduced by the Circular Letter
(for inclusion in the Revision History to the RS Publication)

Nos.	Amended paras/chapters/ sections	Information on amendments	Number and date of the Circular Letter	Entry-into-force date
1	Part II, Para 3.8.2	Reference to the applicable Rules has been specified in connection with cancellation of Part XVIII of the Rules for the Classification and Construction of Sea-Going Ships	313-04-1713c of 03.03.2022	01.04.2022
2	Part II, Para 4.2.14	Requirements have been specified in accordance with Regulation 12.2.2 of Annex I to MARPOL 73/78	313-04-1713c of 03.03.2022	01.04.2022
3	Part II, Para 8.2.4	Requirements have been specified in accordance with Regulation 12.1 of Annex I to MARPOL 73/78	313-04-1713c of 03.03.2022	01.04.2022
4	Part II, Para 8.2.5	Requirements have been specified in accordance with Regulation 12.1 of Annex I to MARPOL 73/78	313-04-1713c of 03.03.2022	01.04.2022
5	Part II. Para 8.2.13	Regulations for the discharge pressure value have been specified	313-04-1713c of 03.03.2022	01.04.2022
6	Part II, Para 8.3.6	Regulations for oil residue (sludge) tank design have been specified	313-04-1713c of 03.03.2022	01.04.2022
7	Part II, Para 11.2	Regulations have been specified in accordance with Regulation 39.3 of Annex I to MARPOL 73/78	313-04-1713c of 03.03.2022	01.04.2022
8	Part VI, Para 1.2.1	New definition "Sulphur content of fuel oil" has been introduced in accordance with IMO resolution MEPC.324(75), para 2	313-04-1713c of 03.03.2022	01.04.2022
9	Part VI, Para 1.3.2.5	Requirements have been specified in accordance with IMO resolution MEPC.324(75), para 2	313-04-1713c of 03.03.2022	01.04.2022
10	Part VI, Paras 2.2.4 to 2.2.14	New paras 2.2.5 — 2.2.7 have been introduced (requirements have been partially transferred from para 2.2.4). Existing paras 2.2.5 — 2.2.11 have been renumbered 2.2.8 — 2.2.14 accordingly	313-04-1713c of 03.03.2022	01.04.2022

Nos.	Amended paras/chapters/ sections	Information on amendments	Number and date of the Circular Letter	Entry-into-force date
11	Part VI, Para 2.3.5	Requirements have been specified in accordance with IMO resolution MEPC.324(75), para 2	313-04-1713c of 03.03.2022	01.04.2022
12	Part VI, Para 2.3.6	Requirements have been specified in accordance with IMO resolution MEPC.324(75), para 2	313-04-1713c of 03.03.2022	01.04.2022
13	Part VI, Para 2.3.7	Requirements have been specified in accordance with IMO resolution MEPC.324(75), para 2	313-04-1713c of 03.03.2022	01.04.2022
14	Part VI, Table 2.6.5	Requirements have been specified in accordance with IMO resolution MEPC.324(75), para 6	313-04-1713c of 03.03.2022	01.04.2022
15	Part VI, Para 2.2.6.3	Requirements have been specified according to IMO circular MEPC.1/Circ.795/Rev.5	313-04-1713c of 03.03.2022	01.04.2022
16	Part VI, para 2.2.6.4	Requirements have been specified according to IMO circular MEPC.1/Circ.795/Rev.5	313-04-1713c of 03.03.2022	01.04.2022
17	Part VI, Table 2.6.7	Requirements have been specified in accordance with IMO resolution MEPC.324(75), para 7	313-04-1713c of 03.03.2022	01.04.2022

Appendix 2 to Circular Letter
No. 313-04-1713c dated 03.03.2022

RULES FOR THE PREVENTION OF POLLUTION FROM SHIPS INTENDED FOR OPERATION IN SEA AREAS AND INLAND WATERWAYS OF THE RUSSIAN FEDERATION, 2022,

ND № 2-020101-163-E

PART II. SHIP'S CONSTRUCTION, EQUIPMENT AND ARRANGEMENTS FOR THE PREVENTION OF POLLUTION BY OIL

3.8 REQUIREMENTS FOR DOUBLE HULL OIL TANKERS

1 **Para 3.8.2** is replaced by the following text:

"**3.8.2** Every oil tanker of 150 m in length and above shall comply with the requirements of the Common Structural Rules for Bulk Carriers and Oil Tankers, as well as the applicable international requirements.".

4.2 TECHNICAL REQUIREMENTS FOR BILGE SEPARATORS

2 **Para 4.2.14** is replaced by the following text:

"**4.2.14** The pipelines for discharge of cleaned water after the bilge separator shall not have connections with the bilge water pipeline system, bilge and ballast systems, except for the outlet referred to in 5.2.13, the recirculation pipeline after automatic stopping device and connection of the emergency drainage pipeline overboard with the pipelines for discharge of cleaned water.

Re- circulating facilities for oily water shall exclude any by-pass of the bilge separator.".

8.2 OIL RESIDUE (SLUDGE) TANKS

3 **Para 8.2.4** is replaced by the following text:

"**8.2.4** For ships of 400 gross tonnage and above the pump discharge pipelines of the system referred to in 8.2.3 shall not be connected to the bilge water piping except for the common pipeline running to the standard discharge connections specified in 7.2.2.1.

However, oil residue (sludge) tanks may be equipped with the arrangements to discharge settled water to tanks of oily bilge water or bilge wells. The arrangements shall be fitted with manually operated self- closing valves and the visual monitoring for the discharge shall be provided.

Moreover, other alternative arrangements which have no direct connection with bilge water piping to discharge settled water from oil residue (sludge) tanks may be enabled to be used.".

4 **Para 8.2.5** is replaced by the following text:

"**8.2.5** For ships of 400 gross tonnage and above the oil residue (sludge) tank discharge piping and bilge water piping shall be equipped with non-return valves to prevent oil residues (sludge) from discharging to the bilge water piping, bilge water tank, bilges of machinery spaces and bilge water separator. The abovementioned piping may serve only one purpose: to connect the oil residue (sludge) tank discharge piping and bilge water piping to the standard discharge connection referred to in 7.2.2.1, or any other approved means of disposal.".

4 **Para 8.2.13** is replaced by the following text:

"**8.2.13** The pump fit for transferring high viscosity oil sludge shall be self-priming, have means to prevent dry running and a discharge pressure of at least 0,3 MPa.

The pump delivery, in m^3/h, may be determined by the formula

$$Q = V/t \qquad (8.2.13)$$

where V = capacity of the oil residue (sludge) tank to be determined by the formulae given in 8.2.1;
t = emptying time equal to 4 h.

In any case the pump delivery rate shall be not less than 2 m^3/h.

8.3 CONSTRUCTION AND EQUIPMENT OF HOLDING TANKS

6 **Para 8.3.6** is replaced by the following text:

"**8.3.6** Provision shall be made for the oil residue (sludge) tank to be steamed for its cleaning without the need to open the tank manholes.".

11 REQUIREMENTS FOR MODU, FOP AND FPU

7 **Para 11.2** is replaced by the following text:

"**11.2** During survey of FPU fitted as Floating Production, Storage and Offloading (FPSO) facilities or Floating Storage Units (FSUs) in accordance with IMO resolution MEPC.311(73) "The 2018 Guidelines for the Application of MARPOL Annex I Requirements to FPSOs and FSUs" for compliance with MARPOL Annex I, in addition to the requirements of regulation 39.2 of Annex I, the provisions of this resolution shall be taken into consideration.".

PART VI. SHIP'S EQUIPMENT AND ARRANGEMENTS FOR THE PREVENTION OF AIR POLLUTION

1.2 DEFINITIONS

8 **Para 1.2.1** after the definition "Shipboard incineration" is supplemented by the definition "Sulphur content of fuel oil" reading as follows:

"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 IMO (ISO 8754:2003 "Petroleum products — Determination of sulphur content — Energy-dispersive X-ray fluorescence spectrometry") for purposes of Chapter 2.3 of this Part of the Rules.".

1.3 SURVEYS AND SCOPE OF TECHNICAL SUPERVISION

9 **Para 1.3.2.5** is replaced by the following text:

"**.5** fuel oil system of the ship with regard to possibility of engine change-over to low sulphur fuel oil at the ship entering a SO_x Emission Control Area and of fuel oil sampling at receiving pipeline by means of sampling arrangement, which design is approved in compliance with IMO resolution MEPC.182(59);".

2.2 NITROGEN OXIDES (NO_X)

10 **Para 2.2.4** is replaced by the following text:

«**2.2.4** For a major conversion involving the replacement of a marine diesel engine with a non-identical marine diesel engine or the installation of an additional marine diesel engine, the requirements in 2.2.6 in force at the time of the replacement or addition of the engine shall apply. The following dates shall be defined as the dates of replacement or the installation of an additional marine diesel engine:

.1 the contractual delivery date of the engine to the ship in the event the engine is fitted onboard and tested for its intended purpose within six (6) months from the date specified in sub paragraphs of regulation 13.5.1.2, Annex VI to MARPOL 73/78; or

.2 in the absence of a contractual delivery date, the actual delivery date of the engine to the ship in the event the engine is fitted onboard and tested for its intended purpose within six (6) months from the date specified in sub-paragraphs of regulation 13.5.1.2, Annex VI to MARPOL 73/78, provided that the date is confirmed by a delivery receipt; or

.3 the actual date that the engine is tested onboard for its intended purpose ship in the event the engine is fitted onboard and tested for its intended purpose on or after six (6) months from the date specified in sub-paragraphs of regulation 13.5.1.2, Annex VI to MARPOL 73/78.

The above-mentioned dates are the dates of major conversion and, where necessary, shall be entered in the IAPP Certificate (Form 2.4.18RF) in para 8a, line "13.2.1.1 & 13.2.2".".

11 New **Paras 2.2.5** — **2.2.7** are introduced reading as follows:

"**2.2.5** If the engine delivery contract is concluded before 1 January 2021, or if, in the absence of a contractual delivery date, the engine is delivered on board (the delivery date is confirmed by a delivery receipt) before 1 January 2021, but not tested within six months after 1 January 2021, due to unforeseen circumstances beyond the control of the shipowner, then the unforeseen delay in delivery" may be considered by the Register in a manner similar to the provisions the Unified Interpretations to MARPOL 73/78 Annex I.

2.2.6 In the case of replacement of a marine diesel engine on or after 1 January 2021, it is determined that the replacement engine cannot meet the standards applicable to Tier III engines, then that replacement engine shall meet the standards applicable to Tier II engines (Tirts are set forth further in 2.2.6).

The criteria of when it is not possible for replacement engine to meet the standards set forth in regulation 13.5.1.1 of Annex VI to MARPOL 73/78 are given in the 2013 Guidelines as Required by Regulation 13.2.2 of MARPOL Annex VI in Respect of Non-Identical Replacement Engines Not Required to Meet the Tier III limit (refer to IMO resolution MEPC.230(65)). The following criteria may be applied:

.1 a replacement engine of similar rating complying with Tier III is not commercially available; or

.2 the replacement engine, in order to be brought into Tier III compliance, needs to be equipped with a NO_x reducing device which due to:

.2.1 size cannot be installed in the limited space available on board; or

.2.2 extensive heat release could have adverse impact on the ships structure, sheeting, and/or equipment whilst additional ventilation and/or insulation of the engine-room/compartment will not be possible;

.2.3 the replacement engine cannot be installed due to its dimensions and weight, as well as due to the fact that it cannot be integrated with the ship components (drive shafts, reduction gears, propeller shafts, etc.), systems and equipment;

.2.4 adjustments of the replacement engine, which shall be equipped with the NO_x reducing device, do not allow the joint operation of the engine and this device;

as well as other criteria indicated in IMO Guidelines mentioned above.

2.2.7 For a major conversion involving the replacement of a marine diesel engine with a non-identical marine diesel engine or the installation of an additional marine diesel engine on or after 1 January 2000 but before 1 July 2010 the provisions of IACS UI MPC20 (Rev.1 Apr 2014) shall apply.

To identify whether the engine is an identical engine, the Unified Interpretations according to IMO circular MEPC.1/Circ.795/Rev.5 shall be considered.".

12 Existing **Paras 2.2.5** — **2.2.11** are renumbered **2.2.8** — **2.2.14** accordingly.

2.3 SULPHUR OXIDES (SO_X)

13 **Para 2.3.5** is replaced by the following text:

"**2.3.5** For ships of 400 gross tonnage and above, details of fuel oil delivered to and used on board shall be recorded by means of bunker delivery notes, which shall be under the ship control within three years since the time of fuel oil delivery and shall be accompanied by a representative sample(s) of the fuel oil obtained at the receiving inlet bunker manifold by one of the following methods:

.1 manual valve-setting continuous-drip sampling arrangement; or

.2 time-proportional automatic sampling arrangement; or

.3 flow-proportional automatic sampling arrangement.".

14 **Para 2.3.6** is replaced by the following text:

"**2.3.6** The representative sample(s) of the fuel oil shall be retained under the ship control until the fuel oil delivered is substantially consumed, but in any case for a period not less than 12 months from the time of delivery. The fuel oil verification procedure is detailed in Appendix VI of Annex VI to MARPOL 73/78.".

15 **Para 2.3.7** is replaced by the following text:

"**2.3.7** Considering the above, the ship fuel oil systems shall ensure the following:

.1 possibility of sampling of the representative sample(s) of the fuel oil at the receiving inlet bunker manifold by means of the sampling arrangement approved by the Register;

.2 possibility of ensuring safe change-over to the fuel oil with sulphur content, as specified in 2.3.2, prior to entry into inland waterways, as well as into SO_x Emission Control Areas. In this case, a possibility of full flushing of the fuel oil service system of all kinds of fuels with sulphur content exceeding the levels specified in 2.3.2 shall be ensured.

The system for feeding fuel oil shall be fully flushed of all kinds of fuel with a sulfur content exceeding the applicable sulphur content. The written fuel changeover procedure shall be available on board the ship and the data in accordance with Regulation 14.6 of Annex VI to MARPOL 73/78 shall be recorded in ship's log.".

2.6 REGULATIONS FOR ENERGY EFFICIENCY OF SHIPS

16 **Table 2.6.5** is replaced by the following:

"Table 2.6.5

Type of ship	Deadweight (DWT) / Gross Tonnage, GT	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	20000 DWT and above	0	10	—	20	—	30
	10000 DWT and above, but less than 20000 DWT	N/A	0 — 10[1]	—	0 — 20[1]	—	0 — 30[1]
Gas carrier[3]	15000 DWT and above	0	10	20	—	30	—
	10000 DWT and above, but less than 15000 DWT	0	10	—	20	—	30
	2000 DWT and above, but less than 10000 DWT	N/A	0 — 10[1]	—	0 — 20[1]	—	0 — 30[1]
Tanker	20000 DWT and above	0	10	—	20	—	30
	4000 DWT and above, but less than 20000 DWT	N/A	0 — 10[1]	—	0—20[1]	—	0 — 30[1]
Container ship	200000 DWT and above	0	10	20	—	50	—
	120000 DWT and above, but less than 200000 DWT	0	10	20	—	45	—
	80000 DWT and above, but less than 120000 DWT	0	10	20	—	40	—
	40000 DWT and above, but less than 80000 DWT	0	10	20	—	35	—
	15000 DWT and above, but less than 40000 DWT	0	10	20	—	30	—
	10000 DWT and above, but less than 15000 DWT	N/A	0 — 10[1]	0 — 20[1]	—	15 — 30[1]	—
General Cargo ships	15000 DWT and above	0	10	15	—	30	—
	3000 DWT and above, but less than 15000 DWT	N/A	0 — 10[1]	0 — 15[1]	—	0 — 30[1]	—
Refrigerated cargo carrier	5000 DWT and above	0	10	—	15	—	30
	3000 DWT and above, but less than 5000 DWT	N/A	0 — 10[1]	—	0 — 15[1]	—	0 — 30[1]
Combination carrier	20000 DWT and above	0	10	—	20	—	30
	4000 DWT and above, but less than 20000 DWT	N/A	0 — 10[1]	—	0 — 20[1]	—	0 — 30[1]
LNG carrier[2]	10000 DWT and above	N/A	10[3]	20	—	30	—
Ro-ro cargo ship (vehicle carrier)[2]	10000 DWT and above	N/A	5[3]	—	15	—	30
Ro-ro cargo ship[2]	2000 DWT and above	N/A	5[3]	—	20	—	30
	1000 DWT and above, but less than 2000 DWT	N/A	0 — 5[1, 3]	—	0 — 20[1]	—	30[1]
Ro-ro passenger ship[2]	1000 DWT and above	N/A	5[3]	—	20	—	30
	250 DWT and above, but less than 1000 DWT	N/A	0 — 5[1, 3]	—	0 — 20[1]	—	0 — 30[1]

Type of ship	Deadweight (DWT) / Gross Tonnage, GT	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
Cruise passenger ship[2] having non-conventional propulsion	85000 GT and above	N/A	5[3]	20	—	30	—
	25000 GT and above, but less than 85000 GT	N/A	0 — 5[1, 3]	0 — 20 [1]	—	0 — 30[1]	—

[1] Reduction factor to be linearly interpolated between the two values dependent upon ship size. The lower value of the reduction factor X shall be applied to the smaller ship size.
[2] Reduction factor applies to those ships delivered on or after 1 September 2019.
[3] Phase 1 commences for those ships on 1 September 2015.

N o t e . N/A means that no required EEDI applies.

".

17 **Para 2.6.6.3** is replaced by the following text:

"**2.6.6.3** The reduction factor X of Phase 2 is applied to the following new ships:

for ship types where Phase 2 ends on 31 March 2022:

.1 the building contract of which is placed in Phase 2 and the delivery date is before 1 April 2026; or

.2 the building contract of which is placed before Phase 2, and the delivery is on or after 1 January 2024 and before 1 April 2026; or

in the absence of a building contract:

.3 the keel of which is laid or which are at a similar stage of construction on or after 1 July 2020 and before 1 October 2022, and the delivery is before 1 April 2026; or

.4 the keel of which is laid or which are at a similar stage of construction before 1 July 2020, and the delivery is on or after 1 January 2024 and before 1 April 2026;

for ship types where Phase 2 ends on 31 December 2024:

.5 the building contract of which is placed in Phase 2, and the delivery is before 1 January 2029; or

.6 the building contract of which is placed before Phase 2, and the delivery is on or after 1 January 2024 and before 1 January 2029; or

in the absence of a building contract:

.7 the keel of which is laid or which are at a similar stage of construction on or after 1 July 2020 and before 1 July 2025, and the delivery is before 1 January 2029; or

.8 the keel of which is laid or which are at a similar stage of construction before 1 July 2020, and the delivery is on or after 1 January 2024 and before 1 January 2029.".

18 **Para 2.6.6.4** is replaced by the following text:

"**2.6.6.4** The reduction factor *X* of Phase 3 is applied to the following new ships:

for ship types where Phase 3 commences with 1 April 2022 and onwards:

.1 the building contract of which is placed in Phase 3; or

.2 the building contract of which is placed before Phase 3, and the delivery is on or after 1 April 2026; or

in the absence of a building contract:

.3 the keel of which is laid or which are at a similar stage of construction on or after 1 October 2022; or

.4 the keel of which is laid or which are at a similar stage of construction before 1 October 2022 and the delivery of which is on or after 1 April 2026;

for ship types where Phase 3 commences with 1 January 2025 and onwards:

.5 the building contract of which is placed in Phase 3; or

.6 the building contract of which is placed before Phase 3, and the delivery is on or after 1 January 2029; or

in the absence of a building contract:

.7 the keel of which is laid or which are at a similar stage of construction on or after 1 July 2025; or

.8 the keel of which is laid or which are at a similar stage of construction before 1 July 2025 and the delivery of which is on or after 1 January 2029.".

19 **Table 2.6.7.** The second row "Bulk carrier" in the "Type of ship" column is replaced by the following:

"Table 2.6.7

Type of ship	a	b	c
Bulk carrier	961,79	Deadweight (DWT) of the ship, where DWT ≤ 279000 or 279000, where DWT > 279000	0,477

".