

Shipping Consultative Committee

IMO unified interpretation in respect of MARPOL Annex VI Regulation 16(9)

Shipboard Incineration

Purpose

1. This paper informs members that the Hong Kong Administration has difficulty to accept the unified interpretation in respect of MARPOL Annex VI Regulation 16(9) adopted recently by the International Maritime Organization (IMO) and seeks comments from the members.

Background

2. IMO Marine Environmental Protection Committee (MEPC), at its fifty-third session, approved the Unified Interpretations for MARPOL Annex VI and the NO_x Technical Code. An interpretation was given to Regulation 16(9) of Annex VI, to allow incinerators installed onboard before 1 January 2000 to operate without meeting the temperature requirements stipulated in Regulation 16(9). This interpretation applies to all ships, i.e. both sea-going and local vessels.

3. The interpretation, in effect, amounts to an “amendment” to the original text of MARPOL Annex VI regulation 16(9) which requires all incinerators to meet the stipulated temperature standards, whether they are installed onboard before or after 1.1.2000. With such an interpretation, there will not be effective control on the emission of unacceptable flue gas when incineration is carried out onboard ships using such incinerators. The pollution effect would be particularly unacceptable if the incinerators are operated in port or sheltered areas.

HKSAR’s actions

4. The HKSAR finds the above situation unacceptable and would insist that incineration may only be carried out on board vessels in accordance with all the provisions of Regulation 16 of MARPOL Annex VI. Incinerators that could not meet the temperature requirements as stipulated in Regulation 16(9) may only be operated for incineration of sewage sludge and sludge oil generated during the normal operation of a ship when the ship is outside port and estuary areas.

5. The Hong Kong Administration would raise the issue at MEPC 54 scheduled to be held at IMO in March 2006.

Advice Sought

6. Members are invited to comment on Marine Department's position on the issue.

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