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Shipping Guidance Notice – 166

REG-UI 008: Biofuels and NOx Limits

To: Shipowners, Operators, Masters, & Recognised Organisations

1. **References**

- MARPOL Annex VI – Regulation 18.3.2
- MEPC.1/Circ.795/Rev.9 – Interpretation 15

2. **Summary**

Following the publication of MEPC.1/Circ.795/Rev.9, a notable increase of enquiries has been noted from ship-owners, operators, and Recognised Organisations in respect of the use of biofuels and biofuel blends as an alternative fuel on ships subject to the requirements of MARPOL Annex VI.

3. **Background**

MARPOL Regulation 18.3.2 sets out requirements for fuels derived by methods other than petroleum refining which includes provisions for engines not to exceed the applicable NOx emission limit set out in paragraphs 3, 4, 5.1.1 and 7.4 of MARPOL Annex VI, Regulation 13. Additionally, Interpretation 15 of MEPC.1/Circ.795/Rev.9 as amended provides further information on the applicability of Regulation 18.3 in respect of biofuel and synthetic fuel.

4. **Red Ensign Group policy & position**

Following review and consideration in respect of enquiries received, and Interpretation 15 of MEPC.1/Circ.795/Rev.9 as amended , The Red Ensign Group (REG) of British Flags have published unified interpretation REG-UI 008 which provides the REG's position on the application of the guidance contained within MEPC.1/Circ.795/Rev.9 – Interpretation 15 and policy in respect of biofuels and NOx emissions. REG-UI 008 - Figure 1 provides a flow chart summary.

REG-UI 008 is appended to this notice and additionally accessible via; https://www.redensigngroup.org/publications/

Steve Gomez - Chief Surveyor
For & on behalf of the Maritime Administrator

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Red Ensign Group

Unified Interpretation

REG-UI 008

Biofuels and NOx Limits

Notice to all Recognised Organisations, Ship Managers, Masters and Engineers

This notice should be read with MEPC.1/Circ.795/Rev.9 as amended.

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This REG-UI remains remains extant until recinded.

Summary

The purpose of this Unified Interpretation is to provide guidance to operators looking to use biofuels or biofuels blends on complying with their regulatory obligations, in particular under MARPOL Annex VI Regulation 18.

1. Introduction/Background

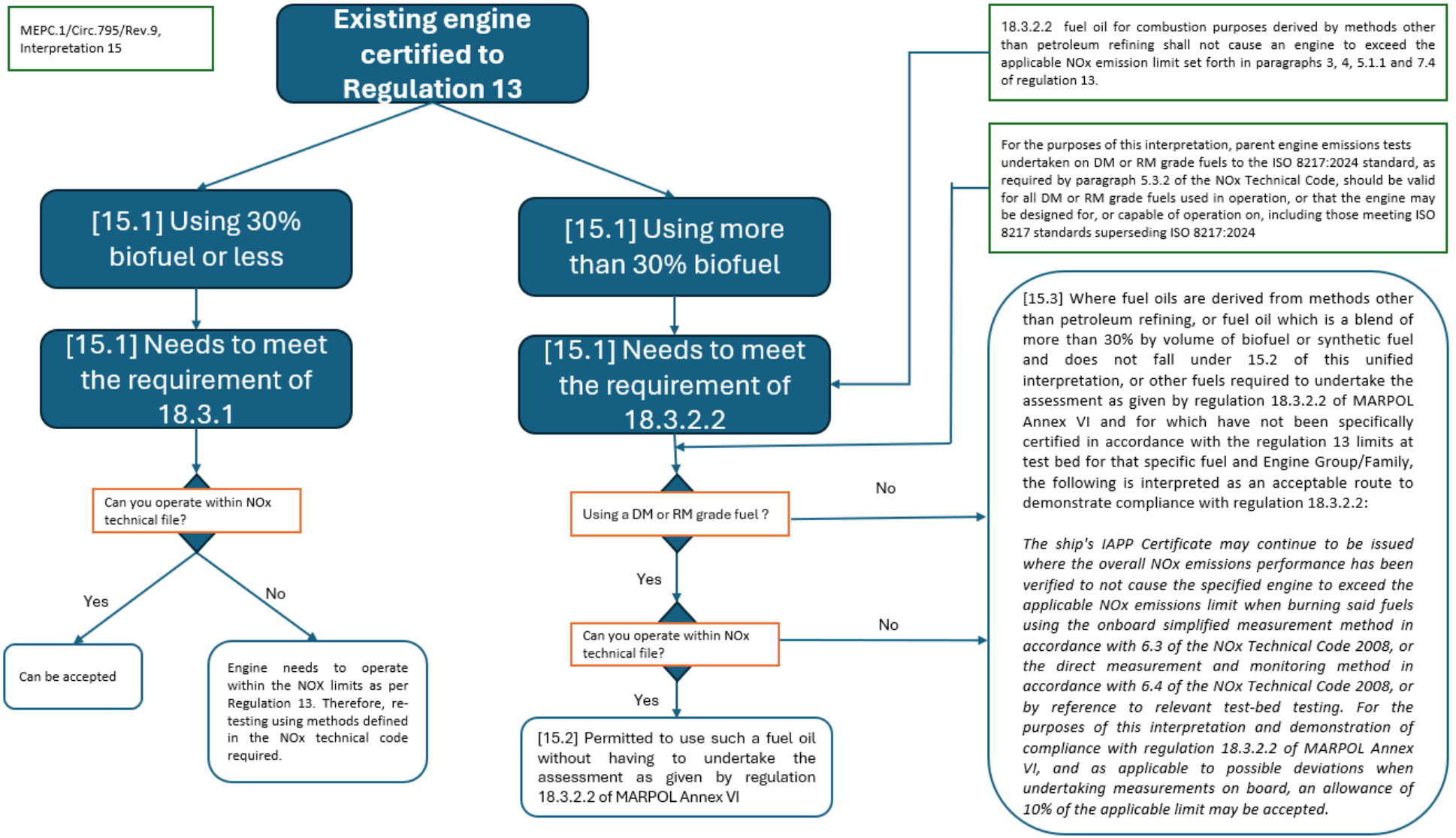
1.1 The Red Ensign Group (REG) is receiving an increasing number of enquiries from ship owners and their Recognised Organisations who are wishing to undertake trials using biofuels and biofuel blends as an alternative fuel as a means of reducing the net carbon emissions from their vessels.

1.2 Currently Regulation 18.3.2 in MARPOL Annex VI has specific requirements for 'fuel oil for combustion purposes derived by methods other than petroleum refining'. Additionally, Interpretation 15 of MEPC.1/Circ.795/Rev.9 as amended provides further information on the applicability of Regulation 18.3 for biofuel and synthetic fuel. This UI is to provide the REG position on the application of the guidance in interpretation 15 of MEPC.1/Circ.795/Rev.9 as amended.

2. Flow Chart

2.1 The following flow chart, Figure 1 provides a comprehensive summary of the REG policy position on biofuels and NOx emissions for all scenarios.

Figure 1 – Guidance on the Application of MEPC.1/Circ.795/Rev.9 Interpretation 15



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