**PPR 6 - 18 to 22 February 2019**

The 6th session of the Sub-Committee on Pollution Prevention and Response (PPR 6) was held at IMO Headquarters from 18 to 22 February 2019.

***Safety and pollution hazards of chemicals and preparation of consequential amendments to the IBC code***

Regarding the development of a recommendation concerning cut-off values to be used when assessing mixtures, GESAMP/EHS 55 had been unable to finalize the development of recommended cut-off values due to time constraints, but had nonetheless developed text describing the procedure for assigning ratings to mixtures which would form the basis for developing a simplified recommendation at GESAMP/EHS 56.

PPR 6 concurred with the evaluation of products and noted their respective inclusion in lists 1, 2, 3 and 5 of MEPC.2/Circ.24, with validity for all countries and with no expiry date.

PPR 6 also concurred with the evaluation of cleaning additives and noted their inclusion in annex 10 to MEPC.2/Circ.24, recalling that MEPC.2/Circ.24 had been published on 1 December 2018.

There was a need to update the Tank cleaning additives guidance and reporting form (MEPC.1/Circ.590) to provide clearer guidance on the types of products that could be submitted, as many of the cleaning products considered were for the cleaning of tanks carrying oil products, removal of cement products, or not intended for the cleaning of NLS tanks.

Consequently, PPR 6 concurred that a revision of MEPC.1/Circ.590 was needed, with expanded guidance on what can be considered as a cleaning additive for the cleaning of NLS cargo residues, and requested interested members to submit proposals to ESPH 25 for further consideration.

*Revision of MEPC.1/Circ.512 and BLG.1/Circ.33, and the development of guidance for assessing and classifying complex chemical mixtures*

PPR 5 had, following the finalization of the draft revised chapters 17, 18, 19 and 21 of the IBC Code, instructed the ESPH Working Group to capture all relevant decisions in relation to the assignment of carriage requirements under the IBC Code by updating BLG.1/Circ.33 and MEPC.1/Circ.512.

ESPH 24 had developed the draft text for such guidance and included it as a new section 9 in the draft revised MEPC.1/Circ.512.

PPR 6 has instructed ESPH to finalize:

* draft revised MEPC.1/Circ.512, including the guidance for the assessment of complex petrochemical mixtures, based on annex 4 to document PPR 6/3; and
* draft PPR.1 circular on Decisions with regard to the categorization and classification of products.

*Inclusion of energy-rich fuels in new annex 12 to MEPC.2/Circ.24 and consequential modifications and amendments required*

MEPC 73 had approved the Guidelines for the carriage of energy-rich fuels and their blends (MEPC.1/Circ.879) and had endorsed the consequential inclusion of a new annex 12 to the MEPC.2/Circular on the Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC code, for the purpose of listing substances that were deemed to be subject to MARPOL Annex I.

PPR 6 concurred with the assessment by ESPH 24 regarding the seven classes of alkanes as energy-rich fuels and noted their inclusion in the new annex 12 (Energy-rich fuels subject to Annex I of MARPOL) to MEPC.2/Circ.24.

Following the inclusion of the seven classes of alkanes in annex 12 to MEPC.2/Circ.24, consequential modifications to the draft revised chapter 17 of the IBC Code were necessary prior to its adoption by MEPC 74.

Similarly, consequential amendments to the 2011 Guidelines for the carriage of blends of petroleum oil and biofuels, as amended (MEPC.1/Circ.761/Rev.1) were also necessary.

PPR 6 has instructed ESPH to prepare the consequential modifications and amendments abovementioned.

*Review of MEPC.2/circular – provisional classification of liquid substances transported in bulk and other related matters*

ESPH 24 had reviewed a draft of MEPC.2/Circ.24 which had been finalized and disseminated in December 2018.

PPR 6 approved the draft MEPC 1/Circ on Guidance on the implementation of provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code related to paraffin-like products, to be approved by MEPC 74.

*Modifications to the draft amendments to the IBC code*

PPR 6 endorsed the draft modifications to the draft amendments to the IBC Code, to be considered and adopted together with the amendments to the IBC Code, by MEPC 74 and MSC 101.

MARPOL Annex II, regulation 8.2.2 and SOLAS regulation XI-1/1 had recently been updated to make reference to the Code for Recognized Organizations (RO Code), whereas the IBC Code, which was subject to mandatory requirements under these two Conventions, had not been updated and therefore still referred to the Guidelines for the authorization of organizations acting on behalf of the Administration (A.739(18)), as amended by resolution MSC.208(81), and the Specifications on the survey and certification functions of recognized organizations acting on behalf of the Administration (A.789(19)).

This had resulted in inconsistent definitions of "Recognized Organizations" between the IBC Code and the MARPOL and SOLAS Conventions.

ESPH 24 had noted that, as a result of the addition of annex 12 to MEPC.2/Circ.24, consequential modifications to the draft revised chapters 17 and 19 of the IBC Code would need to be introduced prior to its adoption (i.e. deletion of the entries that had been included in annex 12 to MEPC.2/Circ.24, as well as deletion of their corresponding biofuel blend entries).

Taking into account the above considerations, PPR 6 prepared draft amendments to chapter 1 of the IBC Code to make appropriate reference to the RO Code, and amended chapters 17 and 19 by deleting a number of entries in the respective tables in these chapters. The full set of modifications to the amendments are to be considered and adopted together with the amendments to the IBC Code by MEPC 74 and MSC 101.

*Revision of the guidelines for the carriage of blends of petroleum oil and biofuels*

PPR 6 endorsed the draft MSC-MEPC circular containing the Revised guidelines for the carriage of blends of biofuels and MARPOL Annex I cargoes, for subsequent approval by MEPC 74 and MSC 101.

A proposal to convert all references to "petroleum oil" to "MARPOL Annex I cargo", since the definition of the former term did not include the energy-rich fuels set out in annex 12 to the MEPC.2/Circular, was agreed.

PPR 6 agreed to delete the table listing the biofuel blends to avoid the need to update the circular whenever new blends were to be added or removed. Instead, reference would be made to the carriage requirements for the biofuel blends set out in either chapter 17 of the IBC Code or list 1 of the MEPC.2/Circular.

*Revision of mepc.1/circ.512 – guidelines for the provisional assessment of liquid substances transported in bulk*

PPR 6 concurred with the draft revised MEPC.1/Circ 512/ Rev.1 on the Guidelines for the provisional assessment of liquid substances transported in bulk, with a view to subsequent approval by MEPC 74.

*Revision of BLG.1/circ.33 –decisions with regard to the categorization and classification of products*

PPR 6 approved the draft revised PPR circular on Decisions with regard to the categorization and classification of products with a view to subsequent approval by MEPC 74.

*Draft interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel*

CCC 5 had agreed, in principle, to the draft Interim Guidelines for the safety of ships using methyl/ethyl alcohol as fuel. MSC 100 had endorsed the referral of the relevant parts of the draft Interim Guidelines identified by the Working Group on Amendments to the IGF Code and Development of Guidelines for Low-flashpoint Fuels to PPR 6, SDC 6, SSE 6 and HTW 6 for consideration and to advise CCC 6 accordingly.

PPR 6 considered and approved paragraph 5.3.2 of the draft Interim guidelines for the safety of ships using methyl/ethyl alcohol as fuel.

***Revised guidance on ballast water sampling and analysis***

Following the approval by MEPC 72 of the Data gathering and analysis plan for the experience-building phase associated with the BWM Convention (BWM.2/Circ.67), PPR 5 considered document from ICES about the addition of an annex on analytical procedures for sampling and analysis to the data gathering and analysis plan for the experience-building phase.

The Working Group on Ballast and Other Ship Vectors (WGBOSV) is a joint working group that follows and supports the work of its three umbrella organizations: the International Council for the Exploration of the Sea (ICES), the Intergovernmental Oceanographic Commission of UNESCO (IOC), and the International Maritime Organization (IMO).

WGBOSV met from 15 to 17 March 2017 to address six terms of reference, including "evaluate methods for collection and analysis of ballast water samples to inform national and/or international procedures for compliance testing of ballast water management systems". Following the meeting, a subset of WGBOSV members developed standard operating procedures (SOPs) for collection of treated ballast water samples using an inline sample port based on best available science, which could be used globally to ensure the data generated by multiple research groups interested in assessing the biological efficacy of ballast water management systems will be comparable.

PPR 6 agreed that, rather than including an annex in BWM.2/Circ.67 containing the SOPs, it was preferable to insert the link to the SOPs and subsequently requested the Secretariat to prepare a draft amendment to BWM.2/Circ.67, incorporating the link to the SOPs, with a view to approval by MEPC 74.

PPR 6 invited the interested delegations to submit a concrete proposal under the output "Urgent measures emanating from issues identified during the experience-building phase of the BWM Convention" at a future session of MEPC.

***Amendment of annex 1 to the AFS convention to include controls on cybutryne, and consequential revision of relevant guidelines***

The AFS Convention had entered into force on 17 September 2008 and that the number of Contracting Governments was currently 83, representing 95.95% of the world's merchant fleet tonnage.

MEPC 71 agreed to include a new output on "Consideration of the initial proposal to amend annex 1 to the AFS Convention to include controls on cybutryne" in PPR's biennial agenda for 2018-2019 and in the provisional agenda for PPR 5 with a target completion year of 2018.

PPR 5 agreed that a more detailed review of cybutryne was warranted. PPR 5 also recommended to the MEPC that the target completion year of the output be extended to 2020.

PPR 6 had for its consideration a comprehensive proposal to amend annex 1 to the AFS Convention and relevant supplementary information.

Evaluation of the association between cybutryne and related adverse effects observed in the environment or on human health

Reductions in the concentrations of cybutryne were recorded in areas where anti-fouling systems containing cybutryne had already been regionally banned and monitored. It was therefore agreed that commensurate reductions would be expected globally following the introduction of controls on cybutryne under the AFS Convention.

PPR 6 encouraged Member States to conduct such baseline studies prior to the entry into force of controls on cybutryne, in order to allow the subsequent determination of the effectiveness of these controls.

*Consideration of specific control measures*

PPR 6 agreed to the draft amendment to annex 1 (Controls on anti-fouling systems) to the AFS Convention to include controls on cybutryne, for consideration by MEPC 74, with a view to approval.

Ships should not apply or re-apply anti-fouling systems containing cybutryne from 3 October 2021 and should either not bear or seal such anti-fouling systems from 3 October 2026. This timeline would allow sufficient lead time for stakeholders and industry to prepare, including the development of appropriate sealer coats.

PPR 6 agreed that, following the evaluations and considerations already undertaken, it was clear that international controls pursuant to the AFS Convention were warranted for cybutryne.

*Form of the International Anti-fouling System Certificate*

PPR 6 agreed to the draft amendment to the model form of the International Anti-fouling System Certificate, for consideration by MEPC 74, with a view to approval.

In its current version, it was recognized that the IAFSC only referred to "an anti-fouling system controlled under annex 1", which would include cybutryne and any other harmful substances that might be controlled in the future. On the other hand, it was noted that the second to fourth compliance options on the IAFSC required the insertion of dates relating to controlled anti-fouling systems' application, removal or sealing, and that these dates could be different for organotin compounds and cybutryne in light of the respective controls.

*Consequential revision of relevant guidelines*

In addition to the amendment of annex 1 to the AFS Convention to include controls on cybutryne, this output also entailed the consequential revision of relevant guidelines. This included the Guidelines for brief sampling of anti-fouling systems on ships (resolution MEPC.104(49)), the 2010 Guidelines for survey and certification of anti-fouling systems on ships (resolution MEPC.195(61)) and the 2011 Guidelines for inspection of anti-fouling systems on ships (resolution MEPC.208(62)).

In addition, it was identified that the Revised guidance on best management practices for removal of anti-fouling coatings from ships, including TBT hull paints (AFS.3/Circ.3/Rev.1) might also have to be revised.

PPR 6 invited proposals to PPR 7 on amendments to the Guidelines for brief sampling, survey and certification, and inspection of anti-fouling systems on ships (resolutions MEPC.104(49), MEPC.195(61) and MEPC.208(62),

*Links to the Hong Kong Convention*

Organotin compounds were included in the items to be listed in the Inventory of Hazardous Materials under the Hong Kong Convention and that this should also be the case for cybutryne when the respective controls entered into force.

***Consideration of the impact on the Arctic of emissions of black carbon from international shipping***

The work plan for consideration of the impact on the Arctic of emissions of Black Carbon from international shipping, entailed the following steps:

1. develop a definition for Black Carbon emissions from international shipping;
2. consider measurement methods for Black Carbon;
3. investigate appropriate control measures to reduce the impact of Black Carbon emissions.

MEPC 68 had approved the definition for Black Carbon emissions from international shipping (and PPR 5 had agreed to the Reporting protocol for voluntary measurement studies to collect Black Carbon data and identified the three most appropriate Black Carbon measurement methods for data collection. In addition, PPR 5 had established a Correspondence Group on Investigation of Appropriate Control Measures to Reduce the Impact on the Arctic of Black Carbon Emissions from International Shipping, to identify candidate control measures to reduce the impact on the Arctic of Black Carbon emissions.

These measures are:

1. Fuel type;

2. Fuel treatment;

3. Exhaust gas treatment;

4. Engine and propulsion system design;

5. Ship design;

6. Operational measures;

7. Regulatory measures (use of current or new regulatory measures in MARPOL Annex VI);

8. Other measures.

PPR 6 agreed that it had completed the work with respect to all the terms of reference given by MEPC 62 and consequently invited the Committee to provide instruction on further work on the reduction of the impact on the Arctic of Black Carbon emissions from international shipping, taking into account:

* the approval of the Bond et al. definition as the definition of Black Carbon for international shipping;
* the agreed Reporting protocol for voluntary measurement studies to collect black carbon data;
* the agreed Reporting protocol for voluntary measurement studies to collect black carbon data;
* a compilation of candidate control measures to reduce the impact on the Artic of Black Carbon emissions from international shipping.

Noting the above, PPR 6 invited MEPC 74 to note that the work on this output had been completed.

***Consistent implementation of regulation 14.1.3 OF MARPOL ANNEX VI***

It was recalled that the draft MEPC circular on Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI, which had been approved by MEPC 73 as MEPC.1/Circ.878.

PPR 6 agreed to the draft 2019 Guidelines on consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI, for submission to MEPC 74, with a view to adoption.

PPR 5 had agreed to develop a single set of guidelines on "Consistent implementation of regulation 14.1.3 of MARPOL Annex VI".

The Intersessional Meeting on Consistent implementation of regulation 14.1.3 of MARPOL Annex VI agreed to develop a draft MEPC circular on guidance on ship implementation planning for 2020.

PPR 6 agreed the Fuel Oil Non-Availability Report (FONAR) as set out in the appendix 1 to the draft guidelines on consistent implementation of the 0.50% sulphur limit. It noted note that regulation 18.2.4 of MARPOL Annex VI does not provide for the FONAR to be reported to the port that has not provided the compliant fuel oil contrary to regulation 18.1 of MARPOL Annex VI, and that the port reception facility module in GISIS may provide a model to address this issue.

It must be recalled that an industry guidance document is being developed as part of a multi-stakeholder exercise to address the impact of new fuel blends or fuel types on fuel and machinery systems, and to provide guidance on the handling, storage and use of such fuels.

*Draft guidance for port State control on contingency measures for addressing non-compliant fuel oil*

Draft guidance for port State control on contingency measures for addressing non-compliant fuel oil had been prepared by the Secretariat based on BWM.2/Circ.62 on contingency measures under the BWM Convention.

PPR 6 noted the draft guidance for port State control on contingency measures for addressing non-compliant fuel oil with a view to considering possible concrete proposals, as a matter of urgency, at MEPC 74.

*2019 guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used on board ships*

PPR 6 agreed to the draft MEPC Circular 2019 guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used on board ships, as amended, for submission to MEPC 74, with a view to approval.

The in-use representative sample or samples should be obtained from a designated sampling point or points. The number and location of designated fuel oil sampling points should be confirmed by the Administration following consideration of possible fuel oil cross-contamination and service tank arrangements.

This circular will supersede MEPC.1/Circ.864.

*Draft MSC-MEPC Circular on Delivery of compliant fuel oil by suppliers*

PPR 6 agreed to the draft joint MSC-MEPC circular addressing the delivery of compliant fuel oil by suppliers, for approval at MEPC 74 and for approval at MSC 101.

It is not possible up to now for competent authorities to enforce regulation 18.3 of MARPOL Annex VI and that in referring to the provision it should be clear what are the explicit obligations of a Party to MARPOL Annex VI and avoid making additional requirements.

*Draft amendments to the 2009 Guidelines for port State control under the revised MARPOL Annex VI (resolution MEPC.181(59))*

MEPC 73 had instructed PPR 6 to clarify the matter of the carriage ban on non-compliant fuel oil being not applicable when an alternative arrangement approved under regulation 4.1 of MARPOL Annex VI was used on board a ship as part of its ongoing work in updating the 2009 PSC Guidelines for port State control under the revised MARPOL Annex VI (resolution MEPC.181(59)).

PPR 6 agreed to the draft 2019 Guidelines for port State control under MARPOL Annex VI, for submission to MEPC 74, with a view to adoption.

MEPC 73 had further approved, in principle, the draft amendments to the 2009 PSC Guidelines concerning the use of electronic record books under MARPOL, with a view to adoption at a future session in conjunction with other amendments to the 2009 Guidelines being developed by the PPR.

III 5 had invited PPR 6 to undertake a technical review of the draft amendments to the 2009 Guidelines, as prepared by III 5 and amendments to the 2009 PSC Guidelines related to exhaust gas-cleaning systems, set out in document.

***Amendments to regulation 14 of MARPOL Annex VI to require a dedicated sampling point for fuel oil***

PPR 6 agreed to the draft amendments to regulations 1, 2, 14 and 18 and appendices I and VI of MARPOL Annex VI, for approval at MEPC 74, with a view to adoption at MEPC 75.

ISWG-AP1 included developed the following draft amendments to MARPOL Annex VI with an expected entry into force in summer 2021:

1. definition of "Sulphur content" (amendments to regulation 2) referring to a specific version of ISO 8754 in a footnote;
2. testing and verification procedure of in-use fuel oil samples (amendments to regulation 14 and associated consequential amendments to regulation 18 and appendix VI).

*Regulation 1 of MARPOL Annex VI*

PPR 6 considered a need to make consequential amendments to regulation 1 of MARPOL Annex VI to reflect that the provisions for a ship to have a designated sampling point, as required in the draft amendments to regulation 14, would be phased in but would not be applicable to all ships.

The Sub-Committee identified that regulation 1 of MARPOL Annex VI could be amended to remove the reference to those specific regulations providing exemptions to certain provisions, so avoiding the need for the provision to be amended further as a consequence of possible future amendments to MARPOL Annex VI.

*Regulation 2, 14.8 and 18.8.2*

PPR 6 agreed to use the term "MARPOL delivered" for fuel oil delivered in accordance with regulation 18.8.1 of MARPOL Annex VI. It prepared an additional draft amendment to regulation 14.8 for onboard sampling of fuel oil not in-use by the ship.

***Standards for shipboard gasification of waste systems and associated amendments to regulation 16 of MARPOL Annex VI***

PPR 5 had established a Correspondence Group on Standards for Shipboard Gasification of Waste Systems and Associated Amendments to Regulation 16 of MARPOL Annex VI and had instructed it to further develop generic draft standards for shipboard gasification of waste systems and associated amendments to regulation 16 of MARPOL Annex VI and the IAPP Certificate.

It had been agreed that draft standards for shipboard gasification of waste systems should be generic and technology neutral and that amendments to regulation 16 of MARPOL Annex VI were not required as the regulation already accommodated alternative designs of shipboard thermal waste treatment devices. Similarly amendments to the IAPP Certificate were not necessary, as it contained specific reference to requirements under regulation 16.

Having noted that draft standards for shipboard gasification of waste systems had not yet been developed to a point where they could be presented as a draft IMO instrument, PPR 6 agreed to request MEPC 74 to retain the item on the biennial agenda of the PPR for the next year and invited interested Member Governments and international organizations to submit concrete proposals for draft standards.

***Review of the 2015 Guidelines for exhaust gas cleaning systems (resolution MEPC.259 (68))***

PPR 5 established the Correspondence Group on Exhaust Gas Cleaning Systems and was instructed to:

1. further refine the 2015 Guidelines for exhaust gas cleaning systems (resolution MEPC.259(68)), including clarification of the terms "EGC system" and "EGC unit"; PAH (polycyclic aromatic hydrocarbons) monitoring; emission testing; approval of scrubbers in accordance with Schemes A and B;
2. develop specific guidance on accidental breakdown, instrument malfunction and perceived temporary non-compliance and transient performance of EGCS;
3. develop consequential amendments to the 2009 Guidelines for port State control under the revised MARPOL Annex VI (resolution MEPC.181(59)).

The Correspondence Group was not able to resolve the following issues:

1. the use of language of a mandatory nature in the SOX Emission Compliance Certificate;
2. the date of application of the new EGCS Guidelines;
3. definition of "12-hour period";
4. definition of PAH;
5. the use of ultraviolet light for PAH measurement;
6. the need to make measurements on the nitrate concentration of discharge water;
7. reference to US EPA 180.1;
8. discharge water monitoring data recording frequency.

PPR 6 made no progress on the revision of the 2015 EGCS Guidelines, despite a draft text being available in the annex to the CG report and a number of papers (including one from IACS) providing detailed proposals for changes to this draft.

Plenary tacitly agreed with the Chair’s proposal not to task the Air Pollution Working Group at PPR 6 to consider the Guidelines. The Sub-Committee also tacitly concurred with the Chair’s proposal not to re-establish the CG to progress the revision of the Guidelines. Of interest was the reason the Chair gave for not re-establishing the CG between PPR 6 and PPR 7 – the knowledge that the EU Member States have submitted a paper to MEPC 74 (MEPC 74/14/1) seeking to modify the scope of this output.

Plenary agreed to request to MEPC the extension of the completion date for this task to 2020 in the view to pursue the work at PPR 7, next year.

PPR 6 had for its consideration a report from its scientific body - GESAMP – which states the following

* "a generalized marine environmental risk assessment should be developed, at least for some model harbors";
* a generalized marine environmental risk assessment should be developed for the wider marine environment as vulnerable areas may well be found outside harbors in coastal areas as well as elsewhere;
* there should be a requirement to monitor the flow rates of washwater discharges throughout the periods of discharges. This will enable reliable estimations of the global volumes of washwater discharges and thus enable a reliable generalized marine environmental risk assessment as suggested above.

A consensus was reached on the need of further studies.

***Development of measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in arctic waters***

MEPC 71 had agreed to include a new output on "Development of measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters" in its 2018-2019 biennial agenda.

MEPC 72 had approved the following scope of work for the PPR:

* develop a definition of heavy fuel oil (HFO) taking into account regulation 43 of MARPOL Annex I;
* prepare a set of guidelines on mitigation measures to reduce risks of use and carriage of HFO as fuel by ships in Arctic waters;
* on the basis of an assessment of the impacts, develop a ban on HFO for use and carriage as fuel by ships in Arctic waters, on an appropriate timescale.

*Development of a definition of HFO*

PPR 6 took note of the following working definition of heavy fuel oil in Arctic waters:

“Heavy fuel oil means fuel oils having a density at 15ºC higher than 900 kg/m3 or a kinematic viscosity at 50ºC higher than 180 mm2/s.”

Many delegations expressed the view that the definition of HFO agreed might need to be amended in light of the 2020 fuel oil Sulphur limit. In this connection, it was agreed that submissions can be made to PPR at a future session on further refinement of the definition.

*Draft Guidelines on mitigation of risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters*

PPR 6 considered the development of draft guidelines on mitigation of risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters.

The Russian Federation proposed a number of potential measures to reduce the risks of use and carriage of heavy fuel oil (HFO) as fuel by ships in Arctic waters, including navigational measures, measures pertaining to ship operation, infrastructure and communications, emergency preparedness for oil spills and early spill detection as well as seafarers professional training.

The Russian Federation also informed on the work to preserve the Arctic marine environment carried out by the Arctic Council Member States within the Protection of the Arctic Marine Environment (PAME) Working Group. PAME, for example, following the AMSA recommendations, is carrying out a project on heavy fuels in the Arctic. In stage II of the project in 2013 a report was delivered on heavy fuels in the Arctic covering potential options to reduce the risk of pollution of the Arctic marine environment by ships using heavy fuels. In stage III of the project, the PAME Expert Group on shipping developed proposals to mitigate risks associated with the use and carriage of heavy fuels in the Arctic.

The guidelines would provide flag Administrations and ship operators with a comprehensive overview of existing measures, as well as potential new measures, when navigating in Arctic waters.

PPR 6 welcomed, in general, the proposed guidelines, but noted the need for further clarity by identifying links between the proposed guidelines and existing IMO instruments, notably the Polar Code as well as information on Particularly Sensitive Sea Areas (PSSAs), and the guidance developed by the Arctic Council's Working Groups on the Protection of the Arctic Marine Environment (PAME) and Emergency Prevention, Preparedness and Response (EPPR) and other ongoing initiatives.

PPR 6 noted the need for further clarity on whether the guidelines would mostly consist of a compilation of existing measures, or whether it would also identify other new measures.

The Sub-Committee recognized its limited competence in relation to some of the proposed topics, in particular those related to navigation measures, ship reporting and ship operations.

In view of the limited available time to review the full document, PPR 6 agreed to establish a Correspondence Group to work intersessionaly to further develop the guidelines and to report to PPR 7.

*Methodology for an assessment of the impacts of a ban on HFO use and carriage as fuel by ships in Arctic waters*

PPR 6 agreed to the finalized draft methodology for analyzing impacts of a ban on heavy fuel oil for the use and carriage as fuel by ships in Arctic waters.

Impact assessments should not be used to delay, but instead, to inform the development of policy options for measures to reduce impacts of the use and carriage as fuel of HFO by ships in Arctic waters. To this end, combined impact assessment methodology could be as follows:

Step 1: Defining the problem

Step 2: Defining policy objectives

Step 3: Development of policy options

Step 4: Analysis of impacts

Step 5: Comparison of policy options and recommendation of preferred option(s)

Canada is of the view that Arctic communities and economies will benefit from reduced risk of an HFO spill. However, Canada also notes that economic and social impacts to Arctic Indigenous communities and Arctic inhabitants of moving to more expensive diesel or alternative fuels are potentially significant and must be considered so as to avoid undesirable impacts on already vulnerable communities.

*Existing impact assessments*

Some delegations expressed the view that developing Guidelines on mitigation measures to reduce risks of use and carriage of heavy fuel oil as fuel by ships in Arctic waters should be done prior to considering a regulatory ban on HFO. Some other delegations expressed the view that the instructions from MEPC indicated that both measures should be developed in parallel.

PPR 6 decided that the documents it had for its consideration on this topic should be forwarded to PPR 7, recognizing that submitting States and organizations could submit additional information to meet the new impact assessment methodology for an assessment.

*Develop a ban on HFO for use and carriage as fuel by ships in Arctic waters, on an appropriate timescale*

PPR 6 considered that MARPOL Annex I would be the most appropriate instrument for a ban on HFO in Arctic waters

With regard to developing a ban on HFO for use and carriage as fuel by ships in Arctic waters, on an appropriate timescale, and on the basis of an assessment of the impacts, PPR 6 agreed that, in view of the fact that the impact assessment methodology had just been developed, the lack of impact assessments carried out in accordance with the finalized methodology, work on this matter would need to be deferred to PPR 7.

***Review of the IBTS guidelines and amendments to the IOPP certificate and oil record book***

PPR 5 had noted the support for the development of a set of consolidated Guidelines and had invited interested Member Governments and international organizations to work together intersessionaly and submit a draft of the consolidated IBTS Guidelines and draft amendments to the IOPP Certificate and Oil Record Book to PPR 6, taking into account comments made with regard to proposals concerning discharge of clean drains and evaporation as a means of disposal of water in the sludge tank

With regard to the issue of evaporation, some delegations supported its deletion from the IBTS Guidelines as an acceptable means of disposal of water in the sludge tank, due to its negative impact to the environment. Conversely, other delegations supported the continued acceptance of evaporation as a means for such disposal, with the addition of appropriate controls and record-keeping provisions.

Taking note of the progress accomplished on the review of the IBTS guidelines, PPR 6 decided to establish a Correspondence Group to prepare a draft consolidated IBTS Guidelines and draft amendments to the IOPP Certificate and Oil Record Book.

***Unified interpretation to provisions of IMO environment-related conventions***

PPR 6 agreed to the draft unified interpretation of regulation 13.2.2 of MARPOL Annex VI, , in relation to the time of the replacement or addition of an engine, with a view to replacing section 7 of MEPC.1/Circ.795/Rev.3on Unified interpretations to MARPOL Annex VI subject to the interpretation being approved by MEPC 74.

It had had for its consideration document PPR 6/16 (IACS), providing a copy of revision 1 of IACS Unified Interpretation (UI) MPC98, relating to the "time of the replacement or addition of the engine" for the applicable Tier standard in accordance with regulation 13.2.2 of MARPOL Annex VI.

IACS UI MPC98 (Rev.1) reflects the amendments to MARPOL Annex VI concerning the designation of the Baltic Sea and the North Sea Emission Control Areas for NOX Tier III control, which had been adopted by resolution MEPC.286(71). IACS had modified the text in the UI so further changes could be avoided if new NOX Tier III emission control areas were designated.

*Unified Interpretations to facilitate the implementation of regulation 16.9 of MARPOL Annex VI*

PPR 6 agreed to the draft revised unified interpretation of regulation 16.9 of MARPOL Annex VI, with a view to replacing section 9 of MEPC.1/Circ.795/Rev.3, subject to the interpretation being approved by MEPC 74.

Unified Interpretations to facilitate the implementation of regulation 13.5.3 of MARPOL Annex VI - Clarification on engine changeover/on-off recording requirements

PPR 6 agreed a draft unified interpretation to regulation 13.5.3 of MARPOL Annex VI, for inclusion in a revision of MEPC.1/Circ.795/Rev.3, subject to the interpretation being approved by MEPC 74.