

海事處

船舶事務科

香港 中環 統一碼頭道38號
海港政府大樓24樓

電話號碼 : (852) 2852 4510
傳真號碼 : (852) 2545 0556

網站 Web Site : <http://www.mardep.gov.hk>
電郵地址 E-mail : ss_css@mardep.gov.hk
貴署檔案 Your Ref. : ---
本處檔案 Our Ref. : MD-CSS-F02-040-04A-001



MARINE DEPARTMENT

Shipping Division

24/F., Harbour Building,
38 Pier Road, Central, Hong Kong

Tel No : (852) 2852 4510
Fax No : (852) 2545 0556

31 July 2025

To: Shipowners, Ship Managers, Masters and Recognized Organizations of Hong Kong-Registered Ships

Dear Sir/Madam,

2025 Revised MARPOL Annex VI requirements

The resolution MEPC.385(81) - 2025 Revised MARPOL Annex VI¹, which was adopted on 22 March 2024, will enter into force **on 1 August 2025**, introducing the requirements of low-flashpoint fuels and other fuel oil related issues, marine diesel engine replacing a steam system, and accessibility of data and inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS).

2. We would like to remind shipowners/ship managers that Hong Kong Registered Ships shall comply with the aforementioned MARPOL requirements and the following points are listed for easy reference:

- i. The definition of “fuel oil” is revised to encompass all fuels without listing, and a new definition for “gas fuel” is added.
- ii. Following bunkering low-flashpoint or gas fuels, a Bunker Delivery Note (BDN) with specified information² is required to be provided to the receiving ship and to be kept on board. Sampling is not required for the delivered low-flashpoint fuel or gas fuel.
- iii. For a ship that undergoes major conversion involving installation of a marine diesel engine which replaces a steam system, the engine shall be considered as a non-identical replacement engine and may meet the Tier II Nitrogen Oxides (NOx) emission standard instead of Tier III in accordance with regulation 13.2.2 of MARPOL Annex VI.

¹ For the details of the [MEPC.385\(81\)](#) and [MEPC.1/Circ.913](#), please refer to Hong Kong Merchant Shipping Information Note (MSIN) [58/2024](#) and [16/2025](#) on the website of the Marine Department (<https://www.mardep.gov.hk/en/legislation/notices/msin/index.html>)

² For the information to be included in the BDN, please refer to Regulation 18 and Appendix V of MARPOL Annex VI.

iv. **On or before 1 January 2026**, Ship Energy Efficiency Management Plan (SEEMP) of all 5,000 gross tonnage and above Hong Kong Registered Ships shall include a description of the methodology intended for collecting data³ with enhanced granularity, in accordance with resolution MEPC.385(81) and MEPC.1/Circ.913.

3. The provisions of Merchant Shipping (Prevention of Air Pollution) (Amendment) Regulation 2025 ([L.N.105 of 2025](#)) related to new requirements of MARPOL Annex VI come into operation on 1 August 2025. All Hong Kong registered ships are required to comply with the MARPOL Annex VI where applicable. Failure to comply with the said regulations may result in port State control intervention.

4. To allow sufficient time to accommodate the above requirements (2)(iii)-(iv), shipowners and ship managers are urged to contact the **Recognized Organizations (ROs)**⁴ authorized by this Department at the earliest opportunity in relation to update SEEMP for collecting and reporting of ship fuel oil consumption data.

5. Shipowners, Ship Managers, Ship Operators, Masters and Recognized Organizations (Classification Societies) are advised to note the information provided in the documents and act accordingly.

6. Should you have any queries, please contact Cargo Ships Safety Section of the Marine Department by email at ss_css@mardep.gov.hk.

Yours faithfully,

(No signature on website)

(H.F. YUE)
Senior Surveyor of Ships/
Cargo Ships Safety Section
for Director of Marine

³ Collecting data specified in **Appendix IX of MARPOL Annex VI** as amended by resolution MEPC.385(81), each ship to which regulation 27 applies should have their SEEMP revised to ensure compliance with regulation 26.2 of MARPOL Annex VI, taking into account the 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP) (resolution MEPC.395(82)).

⁴ For the authorization of Recognized Organizations, please refer to our Marine Department website (<https://www.mardep.gov.hk/en/faq/services-for-cargo-ships-registered-in-hong-kong/survey-audit-and-certification-arrangements/index.html>)