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Circular Letter No.5085
24 October 2025

To: All IMO Members
Parties to the MARPOL Convention which are not Members of IMO

Subject: **Amendments to MARPOL Annex VI**

1 The Secretary-General has received proposed amendments to MARPOL Annex VI from Canada*, Norway and the United Kingdom, all being Parties to MARPOL Annex VI.

2 As requested by the Parties set out in paragraph 1 above, the Secretary-General has the honour to transmit herewith, in accordance with article 16(2)(a) of the Convention, the text of the proposed amendments, given at annex, with a view to their consideration for adoption, in accordance with the provisions of article 16(2)(b), (c) and (d) of the said Convention, at the eighty-fourth session of the Marine Environment Protection Committee, which will be held at IMO Headquarters from 27 April to 1 May 2026.

* Canada was added at their request on October 27, 2025.

ANNEX**AMENDMENTS TO MARPOL ANNEX VI**

(Use of multiple engine operational profiles for a marine diesel engine including clarifying engine test cycles and clarification of entries in data reporting required by regulations 27 and 28, designation of the North-East Atlantic as a new emission control area, accessibility to the IMO Ship Fuel Oil Consumption Database (IMO DCS) and review clause of the short-term GHG reduction measure)

Regulation 2*Definitions*

- 1 Paragraph 1.19 is replaced by the following:

"1.19 *Irrational emission control strategy* means any strategy or measure that, when a marine diesel engine is operated under normal conditions of use, reduces the effectiveness of an emission control system to a level below that expected from the applicable emission test procedures."

Regulation 13*Nitrogen oxides (NO_x)***Tier III**

- 2 New sub-paragraph 5.1.3.2 is added after existing sub-paragraph 5.1.3.1, as follows:

"2 That ship is constructed on or after 1 January 2027 and is operating in the North-East Atlantic Emission Control Area. For the North-East Atlantic Emission Control Area, "ship constructed on or after 1 January 2027" means a ship:

- .1 for which the building contract is placed on or after 1 January 2027; or
- .2 in the absence of a building contract, the keel of which is laid or which is at a similar stage of construction on or after 1 July 2027; or
- .3 the delivery of which is on or after 1 January 2031."

Emission control area

- 3 New sub-paragraph 6.7 is added to paragraph 6, as follows:

"7 the North-East Atlantic Emission Control Area, which means the area described by the coordinates provided in appendix VII."

Regulation 14

Sulphur oxides (SO_x) and particulate matter

4 New sub-paragraph 8 is added to paragraph 3, as follows:

"8 the North-East Atlantic Emission Control Area, which means the area described by the coordinates provided in appendix VII."

Regulation 20

Goal

5 The paragraph is replaced by the following:

" The goal of this chapter is to reduce the carbon intensity of international shipping, working towards the levels of ambition set out in the 2023 IMO Strategy on Reduction of GHG Emissions from Ships."

Regulation 25

Required EEXI

6 Paragraph 3 is replaced by the following:

"3 This regulation shall be kept under review in light of its implementation, taking into account the 2023 IMO Strategy on Reduction of GHG Emissions from Ships."

Regulation 27

Collection and reporting of ship fuel oil consumption data

7 Paragraphs 11 to 13 are replaced by the following new paragraphs 11 and 16, as follows:

"11 The Secretary-General of the Organization shall grant the Administration of a ship or any organization duly authorized by it access to all the reported data for all the preceding calendar years in the IMO Ship Fuel Oil Consumption Database for that ship.

12 Parties shall have access to a non-anonymized database containing data for all ships to which this regulation applies strictly for their analysis and consideration.

13 The Secretary-General of the Organization shall maintain an anonymized database such that identification of a specific ship will not be possible, and facilitate access to public user accounts.

14 The IMO Ship Fuel Oil Consumption Database shall be undertaken and managed by the Secretary-General of the Organization, pursuant to guidelines developed by the Organization.

15 On an ad hoc basis, the Secretary-General of the Organization may share data with analytical consultancies and research entities, under strict confidentiality rules.

16 The Secretary-General of the Organization, on the request of a company, shall grant access to the fuel oil consumption reports of the company's owned ship(s) in a non-anonymized form to the general public."

Regulation 28*Operational carbon intensity***Review**

8 Paragraph 11 is replaced by the following:

"11 This regulation shall be kept under review in light of its implementation, taking into account the 2023 IMO Strategy on Reduction of GHG Emissions from Ships.

Appendix I*Form of International Air Pollution Prevention (IAPP) Certificate (regulation 8)**Supplement to the International Air Pollution Prevention Certificate (IAPP Certificate)*

9 New rows are to be added to the table in section 2.2.1 as follows:

.1 For Tier I (below 13.7.1.2) enter new row:

"

9f	Tier I	NTC 8 (Multiple Engine Operational Profiles)	☐	☐	☐	☐	☐
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"

.2 For Tier II (below 13.7.1.2) enter new row:

"

10 g	Tier II	NTC 8 (Multiple Engine Operational Profiles)	☐	☐	☐	☐	☐
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"

.3 For Tier III (below 13.7.1.2) enter new row:

"

11e	Tier III	NTC 8 (Multiple Engine Operational Profiles)	☐	☐	☐	☐	☐
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"

Appendix II*Test cycles and weighting factors (regulation 13)*

10 The full text of appendix II is replaced by the following:

"The following test cycles and weighting factors shall be applied for verification of compliance of marine diesel engines with the applicable NO_x limit in accordance with regulation 13 of MARPOL Annex VI using the test procedure and calculation method as specified in the NO_x Technical Code.

- .1 For a fixed pitch propeller propulsion engine or a propeller-law operated non-propulsion engine, test cycle E3 shall be applied in accordance with table 1.
- .2 For a propulsion engine that does not operate with a fixed pitch propeller, including an engine fitted as part of a diesel-electric installation or an engine operated with a controllable-pitch propeller, test cycle E2 shall be applied in accordance with table 2.
- .3 For a non-propulsion engine that is a constant-speed engine, test cycle D2 shall be applied in accordance with table 3.
- .4 For a non-propulsion engine that operates as a variable-speed engine, not included above, test cycle C1 shall be applied in accordance with table 4.

Table 1 – Test cycle for a marine diesel engine as given by .1 above

Test cycle E3	Speed	100%	91%	80%	63%
	Power	100%	75%	50%	25%
	Weighting factor	0.2	0.5	0.15	0.15

Table 2 – Test cycle for a marine diesel engine as given by .2 above

Test cycle E2	Speed	100%	100%	100%	100%
	Power	100%	75%	50%	25%
	Weighting factor	0.2	0.5	0.15	0.15

Table 3 – Test cycle for a marine diesel engine as given by .3 above

Test cycle D2	Speed	100%	100%	100%	100%	100%
	Power	100%	75%	50%	25%	10%
	Weighting factor	0.05	0.25	0.3	0.3	0.1

Table 4 – Test cycle for a marine diesel engine as given by .4 above

Test cycle C1	Speed	Rated				Intermediate			Idle
	Torque	100%	75%	50%	10%	100%	75%	50%	0%
	Weighting factor	0.15	0.15	0.15	0.1	0.1	0.1	0.1	0.15

In the case of marine diesel engine to be certified in accordance with paragraph 5.1.1 of regulation 13, the specific emission at each individual mode point shall not exceed the applicable NO_x emission limit value by more than 50% except as follows:

- .1 The 10% mode point in the D2 test cycle.
- .2 The 10% mode point in the C1 test cycle.
- .3 The idle mode point in the C1 test cycle."

Appendix VII*Emission control areas (regulations 13.6 and 14.3)*

11 New paragraphs 6 and 7 are inserted, as follows:

"6 The North-East Atlantic Emission Control Area encompasses the exclusive economic zones and territorial seas, extending up to 200 nautical miles from the baselines of Greenland, Iceland, the Faroes, Ireland, the mainland's of the United Kingdom, France, Spain and Portugal. This designation excludes the seas bounded by the North Sea area, as defined in regulation 1.14.6 of Annex V of the present Convention.

7 The geographic outer boundaries of the North-East Atlantic Emission Control Area are delineated by a series of geodetic lines connecting specified coordinates of latitude and longitude. These coordinates are referenced to the World Geodetic System 1984 (WGS 1984) datum and are presented in a clockwise order, as outlined below:

- .1 the northernmost outer boundary of the North-East Atlantic Emission Control Area begins at the point of intersection of the exclusive economic zones of Greenland and the Canadian Arctic area, as outlined in regulation 14.3 and appendix VII of MARPOL Annex VI, at the coordinate 86°19'.18 N, 60°10'.17 W. From this point, the boundary extends eastward, following the outer boundaries of the exclusive economic zones of Iceland, the Faroes, and the eastern part of the mainland of the United Kingdom, until reaching the coordinate 62°00'.00 N, 01°22'.27 E, where it intersects with the northern boundary of the North Sea area. The boundary of this section is defined by connecting the following coordinates in sequential order:

Point	Latitude	Longitude
1	86°19'.30 N	60°10'.28 W
2	86°57'.80 N	37°45'.68 W
3	86°39'.87 N	12°26'.95 W
4	85°37'.64 N	01°00'.60 E
5	83°42'.56 N	07°58'.17 E
6	82°20'.92 N	05°51'.60 E
7	79°52'.93 N	01°38'.37 W
8	78°19'.00 N	03°20'.63 W
9	76°59'.35 N	02°49'.70 W
10	76°03'.97 N	04°27'.87 W
11	75°18'.13 N	04°17'.90 W
12	74°30'.64 N	04°50'.57 W
13	72°49'.62 N	11°28'.77 W

Point	Latitude	Longitude
14	71°52'.99 N	12°46'.03 W
15	69°54'.98 N	13°37'.77 W
16	69°35'.00 N	13°16'.00 W
17	69°34'.77 N	12°24'.42 W
18	69°09'.46 N	09°42'.43 W
19	68°20'.93 N	07°34'.34 W
20	67°30'.09 N	06°32'.60 W
21	66°24'.66 N	05°45'.14 W
22	65°41'.60 N	05°34'.40 W
23	65°15'.62 N	02°38'.26 W
24	64°26'.05 N	00°29'.18 W
25	63°53'.25 N	00°29'.33 W
26	62°00'.00 N	01°22'.27 E

- .2 continuing from the coordinate 62°00'.00 N, 01°22'.27 E, the boundary proceeds along the northwestern outer limits of the North Sea area, as defined in regulation 1.14.6 of Annex V of the present Convention. The boundary excludes the area south of latitude 62°00'.00 N and east of longitude 04°00'.00 W, connecting the following coordinates:

Point	Latitude	Longitude
26	62°00'.00 N	01°22'.27 E
27	62°00'.00 N	04°00'.00 W
28	58°33'.94 N	04°00'.00 W

- .3 continuing southward, the boundary follows the southwestern outer limits of the North Sea area, as defined in regulation 1.14.6 of Annex V of the present Convention, excluding the English Channel and its approaches eastward of longitude 05°00'.00 W and northward of latitude 48°30'.00 N, until the boundary reaches its southernmost coordinate at 48°30'.00 N, 05°00'.00 W.

Point	Latitude	Longitude
29	48°30'.00 N	05°00'.00 W

- .4 the following section of the North-East Atlantic Emission Control Area extends southward from the coordinate 48°30'.00 N, 05°00'.00 W, until it reaches the intersection of two boundaries: the line joining Cape Trafalgar, Spain (36°11'.00 N, 06°02'.00 W), and Cape Spartel, Morocco (35°48'.00 N, 05°55'.00 W), as outlined in regulation 14.3 and this appendix; and the eastern outer limit of Spain's mainland exclusive economic zone at the coordinate 35°57'.59 N, 05°58'.27 W. This section of the North-East Atlantic Emission Control Area encompasses the waters within the exclusive economic zones and territorial seas of the mainland territories of France, Portugal, and Spain. The area is bounded to the east by the coasts of these countries and to the west by the outer limits of their respective exclusive economic zones. The coordinates defining the outer limits, extending from the southernmost points northward, are as follows:

Point	Latitude	Longitude
30	35°57'.59 N	05°58'.27 W
31	35°57'.88 N	06°02'.14 W
32	35°57'.94 N	06°03'.00 W
33	35°57'.98 N	06°03'.48 W
34	35°58'.09 N	06°04'.90 W
35	35°55'.91 N	06°16'.72 W
36	35°54'.85 N	06°22'.58 W
37	35°54'.63 N	06°23'.83 W
38	35°53'.50 N	06°30'.25 W

Point	Latitude	Longitude
39	35°53'.34 N	06°31'.23 W
40	35°52'.13 N	06°38'.74 W
41	35°51'.94 N	06°39'.54 W
42	35°49'.70 N	06°48'.66 W
43	35°49'.60 N	06°49'.22 W
44	35°49'.18 N	06°51'.55 W
45	35°48'.61 N	06°59'.14 W
46	35°48'.51 N	06°59'.81 W
47	35°47'.62 N	07°06'.03 W

Point	Latitude	Longitude
48	35°46'.01 N	07°31'.75 W
49	35°46'.00 N	07°32'.00 W
50	35°26'.00 N	08°05'.00 W
51	35°19'.00 N	08°21'.00 W
52	35°11'.00 N	08°53'.00 W
53	35°07'.00 N	09°13'.00 W
54	35°01'.00 N	10°30'.00 W
55	34°55'.00 N	11°40'.00 W
56	34°57'.00 N	12°17'.00 W
57	37°00'.00 N	13°09'.00 W
58	38°10'.00 N	13°42'.00 W
59	38°43'.00 N	13°46'.00 W
60	41°09'.00 N	13°16'.00 W
61	41°23'.77 N	13°18'.00 W
62	41°24'.03 N	13°17'.61 W
63	41°24'.04 N	13°17'.61 W
64	41°28'.00 N	13°18'.00 W
65	41°29'.12 N	13°19'.54 W
66	41°30'.12 N	13°20'.50 W
67	41°30'.99 N	13°21'.34 W
68	41°35'.55 N	13°25'.32 W
69	41°44'.00 N	13°30'.10 W
70	41°54'.17 N	13°35'.21 W
71	42°04'.57 N	13°39'.38 W
72	42°15'.70 N	13°43'.28 W
73	42°24'.69 N	13°45'.77 W
74	42°31'.79 N	13°47'.34 W
75	42°39'.44 N	13°48'.60 W
76	42°52'.53 N	13°50'.12 W
77	43°00'.67 N	13°50'.66 W
78	43°09'.85 N	13°50'.86 W
79	43°18'.03 N	13°50'.54 W

Point	Latitude	Longitude
80	43°27'.44 N	13°49'.62 W
81	43°41'.45 N	13°47'.12 W
82	43°57'.73 N	13°42'.42 W
83	44°10'.36 N	13°37'.36 W
84	44°20'.93 N	13°32'.09 W
85	44°25'.70 N	13°29'.41 W
86	44°33'.99 N	13°24'.15 W
87	44°43'.13 N	13°17'.74 W
88	44°55'.81 N	13°08'.03 W
89	45°01'.23 N	13°03'.33 W
90	45°01'.37 N	13°03'.21 W
91	45°07'.52 N	12°57'.42 W
92	45°14'.79 N	12°49'.94 W
93	45°22'.20 N	12°41'.48 W
94	45°29'.33 N	12°32'.60 W
95	45°35'.60 N	12°23'.73 W
96	45°43'.59 N	12°11'.30 W
97	45°50'.60 N	11°59'.37 W
98	46°02'.77 N	11°37'.11 W
99	46°08'.97 N	11°24'.71 W
100	46°15'.55 N	11°09'.69 W
101	46°21'.12 N	10°55'.44 W
102	46°25'.27 N	10°47'.40 W
103	46°29'.31 N	10°39'.08 W
104	46°32'.75 N	10°31'.66 W
105	46°37'.94 N	10°19'.19 W
106	46°42'.62 N	10°06'.98 W
107	46°45'.83 N	09°58'.26 W
108	46°48'.86 N	09°48'.96 W
109	46°52'.16 N	09°37'.92 W
110	46°52'.73 N	09°35'.99 W

- .5 continuing from the coordinate 46°52'.73 N, 09°35'.99 W, the boundary proceeds in a northern direction, following the western outer limits of the exclusive economic zones of the mainland of the United Kingdom, Ireland, Iceland, the Faroes, and Greenland, until it reaches the southernmost intersection of the exclusive economic zone of Greenland and the Canadian Arctic Emission Control Area, at the coordinate 61°24'.74 N, 57°16'.16 W, as detailed in regulation 14.3 and this appendix. The coordinates for this section are as follows:

Point	Latitude	Longitude
111	48°10'.49 N	10°48'.56 W
112	48° 10'.811 N	10° 48'.562 W
113	48° 36'.377 N	12° 36'.484 W
114	49° 12'.414 N	13° 56'.755 W
115	49° 41'.425 N	14° 39'.118 W
116	50° 07'.692 N	15° 08'.259 W
117	50° 34'.072 N	15° 29'.322 W
118	51° 17'.55 N	15° 54'.73 W
119	51° 43'.994 N	16° 02'.877 W
120	52° 11'.469 N	16° 05'.45 W
121	52° 41'.538 N	16° 01'.852 W
122	53° 10'.974 N	15° 50'.662 W
123	54° 05'.164 N	16° 00'.588 W
124	54° 45'.403 N	15° 55'.823 W
125	55° 13'.087 N	15° 43'.866 W
126	55° 38'.987 N	15° 25'.217 W
127	56° 12'.209 N	14° 50'.963 W
128	56° 34'.631 N	14° 19'.862 W
129	56°57'.19 N	14°36'.16 W
130	57°25'.36 N	14°48'.11 W
131	57°46'.48 N	14°52'.42 W
132	58°10'.58 N	14°52'.18 W
133	58°37'.54 N	14°47'.13 W

Point	Latitude	Longitude
134	59°08'.50 N	14°29'.17 W
135	59°36'.59 N	14°03'.25 W
136	59°55'.59 N	13°37'.56 W
137	60°09'.13 N	13°16'.39 W
138	60°42'.23 N	14°00'.03 W
139	60°09'.28 N	17°03'.21 W
140	59°58'.44 N	20°22'.34 W
141	60°03'.00 N	22°08'.29 W
142	60°31'.10 N	25°30'.33 W
143	60°55'.19 N	27°17'.15 W
144	61°31'.52 N	28°48'.06 W
145	62°14'.11 N	29°52'.18 W
146	63°18'.12 N	30°52'.05 W
147	62°30'.13 N	33°39'.15 W
148	61°24'.86 N	35°02'.45 W
149	58°10'.71 N	37°39'.21 W
150	57°12'.46 N	39°29'.13 W
151	56°31'.75 N	42°11'.97 W
152	56°23'.72 N	44°27'.68 W
153	56°42'.83 N	47°08'.20 W
154	57°52'.48 N	51°48'.36 W
155	58°41'.66 N	53°40'.40 W
156	61°24'.74 N	57°16'.16 W

- .6 continuing along the common points between the exclusive economic zone of Greenland and the Canadian Arctic Emission Control Area until reaching the northernmost outer boundary of the North-East Atlantic Emission Control Area at the intersection of the exclusive economic zone of Greenland and the Canadian Arctic Emission Control Area (Point 1), at the coordinates 86°19' 18 N, 60°10'.17 W. The coordinates for this section are as follows:

Point	Latitude	Longitude
157	63°35'.00 N	58°02'.00 W
158	66°37'.15 N	57°39'.10 W
159	67°27'.05 N	57°54'.15 W
160	68°25'.05 N	58°42'.07 W
161	69°29'.06 N	60°51'.10 W
162	70°33'.02 N	61°17'.06 W
163	72°06'.07 N	63°30'.15 W
164	73°25'.15 N	66°25'.05 W
165	74°44'.03 N	72°53'.00 W
166	76°41'.06 N	75°00'.00 W
167	77°30'.00 N	74°46'.00 W
168	78°48'.08 N	73°00'.00 W
169	79°39'.00 N	69°20'.00 W
170	80°25'.00 N	68°20'.00 W
171	80°45'.00 N	67°07'.12 W
172	82°24'.83 N	58°59'.72 W
173	83°35'.80 N	56°51'.48 W
174	84°21'.79 N	56°28'.88 W
175	85°50'.08 N	57°57'.22 W

"

Appendix IX

Information to be submitted to the IMO Ship Fuel Oil Consumption Database (regulation 27)

12 The section of "identity of the ship" is replaced as follows:

"Identity of the ship

IMO number

Period of calendar year for which the data is submitted.....

For the purpose of regulation 27:

Start date (dd/mm/yyyy)

End date (dd/mm/yyyy).....

For the purpose of regulation 28:

Start date (dd/mm/yyyy)

End date (dd/mm/yyyy)....."

13 In the section on "Fuel oil consumption data", the term "Oil-fired Boiler(s)" is replaced by "Fired Boiler(s)".
