

UK P&I CLUB



LP Bulletin

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Bulletin 975 - 06/14 - How to Comply with MARPOL Annex I - Worldwide

The Club has just published a new pocket guide for ship owners and operators on how to prevent improper discharges of oily water from their vessels. Such discharges – which are sometimes undertaken by crew members believing they are acting in their employer's best interests – can prove economically disastrous.

The publication follows two high-profile prosecutions against ship operators in the US last year for pumping out oily bilge water, resulting in criminal convictions and fines of US\$11.5 million. Both cases were brought under the US Act to Prevent Pollution from Ships (APPS), which implements the International Convention for the Prevention of Pollution from Ships (MARPOL).

Annex I of MARPOL requires machinery space bilge water to be processed through a functioning oily water separator before it is discharged, with an oil content meter sampling the effluent to ensure there is no more than 15 parts per million of oil. Under APPS it is a crime in US waters to bypass or trick the oily water separator or oil content meter, or to maintain an inaccurate oil record book.

In the recent US cases, which involved a total of five ships, the oily water separators and oil content meters had been variously bypassed by crew members and the oil record books had been falsified. In one instance the oil content meter was used but was tricked into giving false readings by flushing it with fresh water.

How to comply with MARPOL Annex I is the latest in a series of practical checklist-style guides produced by the Club to help Members prevent claims.

The guide provides checklists in the areas that owners and operators may wish to concentrate on in their efforts to reduce the likelihood of improper discharges. The areas covered are policy, training, procedures, equipment, maintenance, auditing and staff – and in each area we stress the importance of good record keeping.

'How to comply with MARPOL Annex I' can be downloaded from the Loss Prevention section of the Club's website [here](#)

Source of information

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