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Office of
Deputy Commissioner of
Maritime Affairs

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Marine Advisory: 14/2025

Subject: Interim Guidance on the Carriage of Blends of Biofuels and MARPOL Annex I Cargoes by Conventional Bunker Ships

- Ref: (a) [MEPC.1/Circ.917](#) The Interim Guidance on the Carriage of Blends of Biofuels and MARPOL Annex I Cargoes by Conventional Bunker Ships
- (b) [MSC-MEPC.2/Circ.17](#) 2019 Guidelines for the Carriage of Blends of Biofuels and MARPOL Annex I Cargoes

Purpose

The purpose of this Advisory is to provide guidance to all Shipowners, Operators, Masters, and Recognized Organizations when requesting to transport blends of not more than 30 % by volume of biofuel on a conventional bunker ship certified to carry oil cargoes subject to MARPOL Annex I as per [MEPC.1/Circ.917](#).

Background

[MSC-MEPC.2/Circ.17](#) provides that biofuel blends containing more than 1% but less than 75% of a MARPOL Annex I cargo (i.e., biofuel blends containing more than 25 % biofuel) are subject to MARPOL Annex II, with carriage requirements as set out in chapter 17 of the IBC Code.

In contrast, MEPC 78 had agreed on the unified interpretation to regulation 18.3 of MARPOL Annex VI (MEPC.1/Circ.795/Rev.9, section 15) provide, inter alia:

- a) that "a fuel oil which is a blend of not more than 30% by volume of biofuel or synthetic fuel" should meet the requirements of regulation 18.3.1 of MARPOL Annex VI, which covers blends of hydrocarbons derived from petroleum refining;
- b) the definition of a biofuel as "a fuel oil which is derived from biomass and hence includes, but is not limited to, processed used cooking oils, fatty acid methyl esters (FAME) or fatty acid ethyl esters (FAEE), straight vegetable oils (SVO), hydrotreated vegetable oils (HVO), glycerol or other biomass to liquid (BTL) type products"; and,
- c) the application of NO_x requirements to biofuel, synthetic fuel and blends of these fuels.

Noting that MEPC had agreed to allow biofuel blends up to 30% by volume of biofuel to be used on board ships, the IMO further approved circular [MEPC.1/Circ.917](#) where conventional bunker ships may transport blends of not more than 30% by volume of biofuel pending development of carriage requirements.

Guidance

Owners/Operators/Managers of conventional bunker ships engaged in transport and delivery of fuel oil for use by ships, that will carry biofuel blends containing not more than 30 % biofuel, should follow the guidance in [MEPC.1/Circ.917](#):

- Conventional bunker ships may transport blends of not more than 30% by volume of biofuel, as long as all residues or tank washings are discharged ashore unless the oil discharge monitoring equipment (ODME) is approved for the biofuel blend(s) being shipped.
- The international Oil Pollution Prevention certificate (IOPP certificate) issued to a conventional bunker ship carrying blends of not more than 30% by volume of biofuel or synthetic fuel does not need to be modified.

For more information, please contact the Regulations and Standards Department at RegsandStandards@liscr.com or telephone +1 703 790 3434.
