To Whomsoever it may concern

Subject: Sludge Handling in ECA.

1. Use of incinerator to incinerate sludge generated on board ship is permitted as per the regulation 16 of MARPOL Annex VI, including in the ECA.

2. However, it should be noted that individual regional government may have their own specific requirements. Examples of such prohibitions are:

   - The Helsinki Convention on the Protection of the Marine Environment of the Baltic Sea Area, 1992 which requires contracting parties to prohibit any incineration of ship generated wastes on board ships, operating in their territorial seas.
   - California Environmental Protection Agency prohibits onboard incineration between the California coast and the Three Nautical Mile Line as shown on the National Oceanic and Atmospheric Administration (NOAA) Nautical Charts.

3. Also as per Regulation 16 of MARPOL Annex VI, shipboard incineration of sewage sludge and sludge oil generated during normal operation of a ship may also take place in the main or auxiliary power plant or boilers, but in those cases, shall not take place inside ports, harbours and estuaries.

4. According to MEPC.219 (63) - Guidelines for the implementation of MARPOL Annex V- Permission for incineration of the vessel’s sludge in ECA areas also depends on domestic regulations and states that” in general shipboard incineration should not be undertaken when the ship is in port or at offshore terminal. Some ports may have domestic laws that specify additional air emission restrictions, particularly those near high population areas. The use of a shipboard incinerator may require permission from the port authority concerned.”

5. Operation of incinerators within ECA must be agreed with individual port States and affected coastal States in all cases.

Enclosure:
1. Nil.
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