



**REPUBLIC of SAN MARINO  
MARITIME AUTHORITY**

Rev. 0

***MAIN CONTACT: SAN MARINO SHIP REGISTER***

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**San Marino Policy Letter**

**SMPL – 2025-TEC-004**

**20 February 2025**

**San Marino Ship Register SMSR**

**Imo Regulations entering into force in 2025**

TO: Recognised Organisations, Shipowners, Managers, Masters, Seafarers, SMSR partners, SMSR brokers, Surveyors, and the general public.



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<b>Rev. n</b>	<b>Date</b>	<b>Changes</b>	<b>Initials</b>
0	20/02/2025	First Issue	NC



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**0) Introduction**

The scope of this document is to list the obligations entering into force in the year 2025 and to declare the official position of the San Marino Maritime Authority in respect of each of them.

**1) Regulations entering into force on January 1<sup>st</sup>, 2025**

**1.1) IMSBC code amendments (07-23) – MSC.539(107)**

Updates to the International Maritime Solid Bulk Cargoes (IMSBC) code, which has been applicable on a voluntary basis since 1 January 2024, have entered into force on 1 January 2025. These include, but are not limited to, the following changes:

The shippers are now required to declare the 'bulk density' of cargo, as required by SOLAS regulation XII/10 ([MSC.1/Circ.1664](#)).

The following changes have been affected in Appendix 1 (individual schedule of solid bulk cargoes):

• **New cargo entries**

Bulk cargo shipping name (BCSN)	Group	Hazard
BARYTE, FLOTATION CHEMICAL GRADE	A	
BROWN FUSED ALUMINA	C	
CRUSHED GRANODIORITE FINES	A	
DIRECT REDUCED IRON (D) (By-product fines with a moisture content of at least 2%)	A and B	MHB (WF and/or SH)
DUNITE	C	
DUNITE FINES	A	
ELECTRIC ARC FURNACE DUST, PELLETIZED	A and B	MHB (TX and CR)
GROUND GRANULATED BLAST FURNACE SLAG POWDER	A	
MAGNESITE FINES	A	
POTASSIUM NITRATE	C	
SODIUM NITRATE	C	
SODIUM NITRATE AND POTASSIUM NITRATE MIXTURE	C	



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CELESTINE CONCENTRATE (under Mineral Concentrates schedule)	A	
FISH MEAL (FISH SCRAP), STABILIZED ANTI-OXIDANT TREATED	B	MHB (SH)

- **Deleted cargoes from the solid bulk cargo list:**

Bulk cargo shipping name (BCSN)	Group	Hazard
FISH MEAL (FISH SCRAP), STABILIZED UN 2216 ANTI-OXIDANT TREATED	B	This cargo has effectively been reclassified from Class 9 dangerous goods to an MHB cargo. The IMSBC Code carriage requirements remain the same, but ships will no longer require a dangerous goods certificate to carry the cargo.

- The list of non-cohesive cargoes (Appendix 3 of the IMSBC Code) has been amended to include the following cargoes:
  - a. BARYTE, FLOTATION CHEMICAL GRADE;
  - b. CRUSHED GRANODIORITE FINES;
  - c. DUNITE;
  - d. DUNITE FINES;
  - e. ELECTRIC ARC FURNACE DUST, PELLETIZED;
  - f. POTASSIUM NITRATE;
  - g. SODIUM NITRATE;
  - h. SODIUM NITRATE AND POTASSIUM NITRATE MIXTURE; and
  - i. SUPERPHOSPHATE

This means that the angle of repose for the above cargoes must be determined prior to loading so that the relevant trimming provisions under section 5 of the IMSBC Code are applied accordingly.

- The list of Solid Bulk Cargoes for which a Fixed Gas Fire Extinguishing System may be exempted has been updated to its 6th revision to include the new cargo "ELECTRIC ARC FURNACE DUST, PELLETIZED" that can be exempted from having a fixed CO<sub>2</sub> fire-fighting installation on board ships ([MSC.1/Circ.1395/Rev.6](#)).

The San Marino Maritime Authority adopts the above described amendments therefore the vessels flying the San Marino Flag are required to fully comply with the new provisions.



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**1.2) Amendments to the STCW Convention and Code on Electronic Seafarers' Certificates – MSC.540(107) & MSC.541(107)**

To support the global digitalisation trend, these amendments to the STCW Convention (regulations I/1 and I/2) and STCW Code (section A-I/2) allow seafarers' certification to be issued in electronic form and specify the minimum information that must be included on these certificates.

The San Marino Maritime Authority adopts the mentioned amendments and refers to the [MSC.1/Circ.1665](#) for the guidelines on the use of electronic certificates of seafarers.

**1.3) Amendments to MARPOL Annex I, Regulations 15.3, 15.5 and 34.3 to 34.5, on the establishment of the Red Sea and Gulf of Aden as Special Areas – MEPC.381(80)**

Due to their significant marine ecological and environmental conditions, as well as their importance as a major route for maritime commerce, the Red Sea and Gulf of Aden regions were recognised as a 'Special Area' under regulation 1.11 of MARPOL Annex I. However, for the 'Special Area' status to take effect, adequate reception facilities had to be provided in the relevant ports of the coastal State Parties.

MEPC-80 confirmed that States in the Red Sea and Gulf of Aden areas, such as Djibouti, Egypt, Jordan, Israel, Saudi Arabia, Somalia, and Sudan, now provide adequate reception facilities and arrangements, including treatment facilities for oily wastes and residues at ports and terminals in these areas. Accordingly, the effective date for MARPOL Annex I Special Areas in the Red Sea and Gulf of Aden is set to be 1 January 2025.

Ships of 400 GT and above are advised that from 1 January 2025, the discharge of oil or oily mixtures into the sea is prohibited within this region, except under the following conditions:

- a. The ship is enroute;
- b. The oily mixture has been processed through oil filtering equipment that meets the requirements of regulation 14.7 of Annex I;
- c. The oil content of the effluent, without dilution, does not exceed 15 parts per million;
- d. The oily mixture does not originate from cargo pump room bilges on oil tankers; and
- e. In the case of oil tankers, the oily mixture is not mixed with oil cargo residues.



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Additionally, from 1 January 2025, any discharge of oil or oily mixtures from the cargo area of an oil tanker is prohibited while in the Red Sea and Gulf of Aden Special Areas. This requirement does not apply to the discharge of clean or segregated ballast.

The San Marino Maritime Authority adopts the above described amendments therefore the vessels flying the San Marino Flag are required to fully comply with the new provisions.

**1.4) Amendments to MARPOL Annex V, Regulation 6, on the establishment of the Red Sea as Special Areas – MEPC.382(80)**

The Red Sea area was recognised as a Special Area under Annex V (regulation 1.14.4) of MARPOL. However, for the 'Special Area' status to be effective, adequate reception facilities had to be provided in the relevant ports of the coastal State Parties.

At MEPC-80, the special area status was confirmed based on information about the necessary reception facilities for MARPOL Annex V wastes and residues at all ports and terminals in the region.

From 1 January 2025, the discharge of garbage into the sea can only be permitted while the ship is enroute and in accordance with Regulation 6 (Discharge of garbage within special areas) of MARPOL Annex V.

The San Marino Maritime Authority adopts the above described amendments therefore the vessels flying the San Marino Flag are required to fully comply with the new provisions.

**2) Regulation coming into force on 1 February 2025**

**2.1) Amendments to Appendix II of the BWM Convention concerning the revised form of the Ballast Water Record Book (BWRB) – MEPC.369(80)**

Regulation B-2 of the BWM Convention requires that ships must have a BWRB which at least contains the information specified in Appendix II to the Convention (Form of Ballast Water Record Book).

A report on the experience-building phase associated with the BWM Convention indicated that the most frequently reported deficiencies by PSC were related to the entries in the BWRB.



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To address these issues, Appendix II of the BWM Convention has been updated to enhance and clarify the information recorded in the BWRB.

Companies are recommended to refer to the [BWM.2/Circ.80](#) for guidance on ballast water record-keeping and reporting and to ensure that their ships complete and maintain the newly agreed format of the BWRB from 1 February 2025.

**3) Regulation coming into force on 1 May 2025**

**3.1) Amendment to MARPOL Annex VI, Regulation 14, and Appendix VII on Mediterranean Sea ECA – MEPC.361(79)**

Since 1 May 2024, the Mediterranean Sea has been designated as an Emission Control Area (ECA) for sulphur oxides (SO<sub>x</sub>) and particular matter (PM); however, these requirements will take effect from 1 May 2025 and then onwards it will be mandatory for ships to either use fuel oil with a sulphur content of 0.10% m/m or utilize an exhaust gas cleaning system (EGCS) while sailing through the Mediterranean Sea ECA.

The San Marino Maritime Authority adopts the above described amendments therefore the vessels flying the San Marino Flag are required to fully comply with the new provisions.

**4) Regulation coming into force on 26 June 2025**

**4.1) Hong Kong Convention on Ship Recycling – MEPC.210(63)**

The Hong Kong Convention (HKC) applies to ships over 500 GT engaged in international voyages. It aims to ensure that ship recycling does not pose unnecessary risks to human health, safety, or the environment. The regulations outlined in the Convention cover the design, construction, operation, and preparation of ships for safe and environmentally sound recycling.

After its entry into force, new ships (built on or after 26 June 2025) will be required to have an approved and certified [Inventory of Hazardous Materials \(IHM\)](#) onboard. By 26 June 2030, existing ships must also have an approved and certified IHM onboard.



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Additionally it will be necessary to complete and compile the necessary Material Declarations (MD) and Supplier Declarations of Conformity (SDoC) for any items supplied to the ship that are part of the ship's structure or fitted equipment.

An initial survey will be required to verify the inventory of hazardous materials. Additional surveys will be required during the ship's operational life, as well as a final survey before recycling ([MEPC.222\(64\)](#)).

At the end of its life, the ships to which this Convention applies can only be recycled at HKC-compliant ship recycling facilities ([MEPC.211\(63\)](#)).

Ship recycling facilities will have to prepare a [Ship Recycling Plan](#) specifying how each ship will be recycled, basis which a Ready for Recycling certificate will be issued.

For further information, reference should be made to the UKP&I Club's [Risk Focus: Inventory of Hazardous Materials \(IHM\) – 2nd Edition](#).

**5) Regulations coming into force on 1 August 2025**

**5.1) Amendments to MARPOL Annex VI (Low-Flashpoint Fuels and Other Fuel Oil Related Issues, Marine Diesel Engine Replacing Steam System, Accessibility and Inclusion of Data on Transport Work and Enhanced Granularity in the IMO Ship Fuel Consumption Database (IMO DCS)) – MEPC.385(81)**

Amendments to Regulations 2, 14 and Appendix I of MARPOL Annex VI revise the definition of gas fuels to align with the IGF Code and clarify that the in-use/onboard sampling points shall not apply to gas/low-flashpoint fuels. Furthermore, Regulation 18 is amended to apply bunker delivery note (BDN) requirements to gas/low-flashpoint fuels. For ships using gas or low-flashpoint fuels it is recommended to ensure that the minimum information is included in the BDN.

Amendments to Regulation 13.2.2 of MARPOL Annex VI clarify that replacing a steam system with a diesel engine is considered a major conversion, rather than a minor modification. Where a Tier III engine would be required and a Tier II engine is permitted for installation as the replacement, this Administration will report this to the IMO. Any replacement of a steam system with a marine diesel engine after these amendments take effect on 1 August 2025, will require compliance with Regulation 13 of MARPOL Annex VI, and any amendments thereof.





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Amendments to Regulation 27 of MARPOL Annex VI allow IMO to share ship's fuel oil consumption data with analytical consultancies and research entities, under strict confidentiality and with the company's consent, in a non-anonymized form. Additionally, under the Appendix IX of MARPOL Annex VI, there are new obligations to report the following data:

- a. Total onshore power supplied;
- b. Total transport work;
- c. Installation of innovative technology; and
- d. Laden distance travelled (on a voluntary basis).

Ships of 5,000 GT and above are recommended to ensure that their SEEMP Part II is modified as necessary to incorporate the collection of this newly required data.

The San Marino Maritime Authority adopts the above described amendments therefore the vessels flying the San Marino Flag are required to fully comply with the new provisions.

**6) Regulations coming into force on 1 October 2025**

**6.1) Amendments to regulations A-1 and B-2 of the BWM Convention on the use of electronic record books – MEPC.383(81)**

These amendments allow the Ballast Water Record Book to be electronic and ensure a harmonised approach with the MARPOL Annexes and the NOx Technical Code. San Marino Maritime Authority recommends to refer to the Guidelines for the use of electronic record books under the BWM Convention ([MEPC.372\(80\)](#)).