



REPUBLIC OF ESTONIA  
MARITIME ADMINISTRATION

CIRCULAR No 4

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## Clarification of Exhaust Gas Cleaning System (EGCS) operations in territorial waters and ports of Estonia

The Ministry of the Environment, in cooperation with the Estonian Maritime Administration, has issued a clarification regarding EGCS operations in the territorial waters and ports of Estonia. According to Regulation 14 of Annex VI to MARPOL 73/78, ships are required to use fuel oil with a sulphur content not exceeding the limits stipulated in regulation 14.1 or 14.4. Regulation 4 allows the use of alternative compliance methods.

Clause 7 (6) 3) of regulation No 73 by the Minister of the Environment “Environmental requirements for liquid fuels, sustainability criteria for biofuels, monitoring and reporting procedures on the compliance of liquid fuels with environmental requirements, and methodology for the determination of greenhouse gas emission savings from the use of biofuels and liquid biofuels” provides that emission abatement methods may be used if the criteria set out in Annex 9 are met. According to which:

“The washing water of EGCS using chemicals, additives, preparations and locally produced relevant chemical compounds as referred to in paragraph 10.1.6.1 of MEPC.184 (59) shall not be discharged, including in enclosed ports and estuaries, except: provided that the ship owner demonstrates that the discharge does not cause significant adverse effects on human health or the environment. If the chemical compound used is sodium hydroxide, it shall be sufficient that the washing water meets the criteria set out in MEPC.184 (59) and has a pH of not more than 8,0”.

In addition, clauses 143 (3) 3) and 4) of the Water Act which enters into force on 01.10.2019 do not treat washing water discharges as violation of restriction of pollutants discharges from ships, if in compliance with the requirements of MARPOL.

If the ship owner can demonstrate that the washing water from the EGCS meets international requirements, discharge into the sea is permitted. Port authorization is required if EGCS washing water is discharged in port area.

The use of closed-loop EGCS is permitted in the territorial waters and ports of Estonia, provided that it meets the relevant requirements and is certified. Discharging of washing water from closed-loop EGCS is not permitted.

(signed digitally)

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Head of Maritime Safety Division  
Deputy Director General