

Circular 127 / 2016

To: Vessel Owners, Managers, Masters, Officers, Deputy Registrars, Surveyors and Other Interested Parties

Subject: MARPOL Annex VI – additional NOx Technical Code certification requirements and changes to the IAPP Record of Construction and Equipment

Date: 27 February 2016

Summary

A number of amendments to MARPOL Annex VI* will enter into force on 1 March 2016.

These include:

- Changes to the definitions of 'fuel oil' and 'marine diesel engine'
- Minor amendments to Regulation 13.7, and
- Changes to the format of sections 2.2.1 and 2.5.1 of the Supplement to the International Air Pollution Prevention Certificate (the IAPP Record of Construction and Equipment).

Impact of the new definitions on NOx Technical Code certification

The changes to the definitions mean that gas-fuelled engines installed on ships constructed (keel laid) on or after 1 March 2016, or gas-fuelled additional or non-identical replacement engines installed on or after that date, require NOx Technical Code certification. Dual-fuelled engines were already required to have NOx Technical Code certification.

New format IAPP Record of Construction and Equipment

The new format IAPP Record of Construction and Equipment will be issued to existing vessels when the vessel's current IAPP certificate expires, as per the IMO guidance contained in circular MSC-MEPC.5/Circ.6.

The IMO has issued guidelines, contained in circular MEPC.1/Circ.849, on how to complete it (attached below).

- Published as IMO Resolution MEPC.258(67)

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MEPC.1/Circ.849
17 November 2014

GUIDANCE ON THE SUPPLEMENT TO THE IAPP CERTIFICATE

1 The Marine Environment Protection Committee, at its sixty-seventh session (13 to 17 October 2014), recognizing the need for guidance on the uniform application of the amendments to item 2.2.1 of the supplement to the IAPP Certificate, adopted at the session by resolution MEPC.258(67), approved the *Guidance on the supplement to the IAPP Certificate*, as set out in the annex.

2 Member Governments are invited to bring the annexed guidance to the attention of their Administration, industry, relevant shipping organizations, shipping companies and other stakeholders concerned.

ANNEX

GUIDANCE ON SUPPLEMENT TO THE IAPP CERTIFICATE

Engine Certification Scenario (SCD = Ship Construction Date, 2.19 & 2.2)		Installed		Identical* replacement		Major Conversion				
		1/1/1990 ≥ SCD < 1/1/2000		SCD ≥ 1/1/2000	SCD < 1/1/2000	SCD ≥ 1/1/2000	Substantial Modification or MCR increase > 10%		Non-identical*	Additional
							SCD < 1/1/2000	SCD ≥ 1/1/2000	replaced ≥ 1/7/2010 #	installed ≥ 1/1/2000 #
Applicable regulation of MARPOL Annex VI (NTC = NOx Technical Code 2008) (AM = Approved Method)		13.7.1.1 (AM)	13.7.1.2	Tier, as applicable per SCD	N/A as per 13.1.1.2 (see Notes)	Tier, as applicable per SCD	Tier I as per 13.2.3.1	Tier, as applicable per SCD	Tier, depending on date of replacement or addition	
									Tier II if Tier III not possible	
IAPP Supplement Item 2.2.1 - Nitrogen oxides (NOx) (regulation 13)										
1	Manufacturer and model		Complete rows 1-5 only if entry to be made in any of rows 6-14 for engines under scope of regulation 13 CAA: Complete As Appropriate #: Installation date – MEPC.1/Circ.795/Rev.2 (Unified Interpretation on time of replacement of an engine) *: Identical engine – MEPC.1/Circ.795/Rev.2 (Unified Interpretation on identical replacement engines) Notes: (A) This also includes certain non-identical engines installed < 1/7/2010. (B) In the case of the identical replacement of an engine which had been already subject to "Major Conversion" (13.2.3.1), then that engine would also need to be certified to Tier I.							
2	Serial number									
3	Use (applicable application cycle(s) – NTC 3.2)									
4	Rated power (kW) (NTC 1.3.11)									
5	Rated speed (RPM) (NTC 1.3.12)									
6	Identical engine installed ≥ 1/1/2000 exempted by 13.1.1.2		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	Identical engine installation date (dd/mm/yyyy) as per 13.1.1.2					CAA	CAA			
8a	Major Conversion (dd/mm/yyyy)	13.2.1.1 & 13.2.2							CAA	CAA
8b		13.2.1.2 & 13.2.3					CAA	CAA		
8c		13.2.1.3 & 13.2.3					CAA	CAA		
9a	Tier I	13.3	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9b		13.2.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	CAA
9c		13.2.3.1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>
9d		13.2.3.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>
9e		13.7.1.2	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

10a	Tier II	13.4	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10b		13.2.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	CAA
10c		13.2.2 (Tier III not possible)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>
10d		13.2.3.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>
10e		13.5.2 (Exemptions)	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10f		13.7.1.2	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11a	Tier III (ECA-NOx only)	13.5.1.1	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11b		13.2.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	CAA
11c		13.2.3.2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>
11d		13.7.1.2	<input type="checkbox"/>	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12	AM*	Installed	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13		Not commercially available at this survey	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14		Not applicable	CAA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

* Refer to the 2014 Guidelines on the approved method process (resolution MEPC.243(66)).

NOTES TO GUIDANCE TABLE

- 1 CAA: Complete as appropriate, (x) for the answer "yes" and "applicable" or a (–) for the answers "no" and "not applicable", as appropriate for section 3 on the Notes section of the Supplement.
- 2 Rows 1-5: Completed only where one or more entries are to be made in rows 6-14. For rows 3-5 the terms are defined by the given cross references.
- 3 Date of installation: As per unified interpretation on time of replacement of an engine in MEPC.1/Circ.795/Rev.2.
- 4 Identical engine: As per unified interpretation on identical replacement engines in MEPC.1/Circ.795/Rev.2. This UI defines what represents an "identical" engine and hence, by application of the converse, what represents a "non-identical" engine.
- 5 Note A: Under the original regulation 13 (regulation 13(2)(a)(i)) the definition of the replacement engine provided that for a ship constructed before 1 January 2000 it was possible, after 1 January 2000, to install an uncertified identical or non-identical replacement engine built before 1 January 2000 which was still in its pre-1 January 2000 condition (it had not been subject to a major conversion as given under sub-points (ii) or (iii) of that regulation) which was not identical. This provision altered with the 2008 revision, however, such an uncertified engine, even if "non-identical" as now defined, should, since it was compliant with the requirements of regulation 13 as it then existed, for the purposes of the revised Annex be considered in that context as "identical".
- 6 Note B: Where an engine installed on a ship constructed before 1 January 2000 was, after 1 January 2000, subject to a major conversion (substantial modification or MCR increased more than 10%), that engine needed to have been certified to tier I. If that engine is now replaced under the terms of the revised annex then, for the replacement engine to be considered identical, it must be identical to the previous engine after the application of the major conversion.
- 7 Rows 8-11: The relevant entry is to be made against the particular regulation subsection which results in the tier the engine has been certified to.
- 8 Row 12: This row entry is completed on verification that an Approved Method has been installed, following the survey procedure as given in the Approved Method File.
- 9 Row 13: Where an Approved Method is "not commercially available" it needs to be reassessed and the shipowner will need to reinvestigate that point, at each scheduled survey.
- 10 Row 14: This reflects regulation 13.7.3 and resolution MEPC.243(66), that where an engine to which an Approved Method nominally applies has been altered away from its original condition, the basis on which the Approved Method (regulation 13.7.5) was assessed cannot be assumed to apply. In such cases, the Approved Method certifier would issue a letter officially indicating to all interested parties that a particular Approved Method was not applicable.