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PREVENTION AND RESPONSE  
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Agenda item 16

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**UNIFIED INTERPRETATION TO PROVISIONS OF  
IMO ENVIRONMENT-RELATED CONVENTIONS**

**Clarification on engine changeover/on-off recording requirements**

**Submitted by the International Association of Classification Societies (IACS)**

**SUMMARY**

*Executive summary:* This document seeks clarification on the recording requirements with regard to the engine operating status as required by regulation 13.5.3 of MARPOL Annex VI

*Strategic direction,  
if applicable:* 6

*Output:* 6.1

*Action to be taken:* Paragraph 8

*Related document:* MEPC 68/3/8

**Introduction**

1 Amendments to regulation 13.5.3 of MARPOL Annex VI were adopted by resolution MEPC.271(69), which entered into force on 1 September 2017. This regulation now states:

"The tier and on/off status of marine diesel engines installed on board a ship to which paragraph 5.1 of this regulation applies which are certified to both Tier II and Tier III or which are certified to Tier II only shall be recorded in such logbook as prescribed by the Administration at entry into and exit from an emission control area designated under paragraph 6 of this regulation, or when the on/off status changes within such an area, together with the date, time and position of the ship."

2 IACS members have considered the underlined element of the above text and discussed its implementation with regard to the recording requirements of the engine operating status.

## Discussion

3 In considering regulation 13.5.3 of MARPOL Annex VI with regard to the recording requirements, the Committee, at its sixty-eighth session, considered document MEPC 68/3/8 (Germany), which discussed the following possible cases on the status of an engine at the time of a ship's entry into a NO<sub>x</sub> Emission Control Area (NECA) i.e.:

- .1 Tier III compliant engines running or in stand-by mode (all engines necessary for safe ship operation, including all engines required by SOLAS regulation II-1/41; and all engines intended to be used for operational purposes inside the NECA);
- .2 Tier II/Tier III compliant engines: Recording of switch over to the Tier III mode prior to entry into the NECA; and
- .3 Tier II compliant engines stopped prior to entry into the NECA (e.g. Tier III non-compliant additional main or auxiliary engines not necessarily needed for safe ship operation and not needed whilst the ship operates in the NECA).

4 Having carefully considered the wording "Tier II only" in regulation 13.5.3 of MARPOL Annex VI, IACS members understand that this is related to paragraph 3.3 above i.e.:

- .1 **Tier II engine stopped prior to entry into the NECA on a ship constructed after the relevant NO<sub>x</sub> Tier III emission control area takes effect** (e.g. ships with keel laying dates after 1 January 2016 operating in North America/US Caribbean or ships with keel laying dates after 1 January 2021 operating in North America/US Caribbean or in North Sea/Baltic Sea) as mentioned in paragraph 3.3 above.
- .2 **Tier II engine operation in the NECA under the temporary exemption afforded by regulation 13.5.4 of MARPOL Annex VI:**  
Emissions of nitrogen oxides from a marine diesel engine subject to paragraph 5.1 of this regulation that occur immediately following building and sea trials of a newly constructed ship, or before and following converting, repairing, and/or maintaining the ship, or maintenance or repair of a Tier II engine or a dual fuel engine when the ship is required to not have gas fuel or gas cargo on board due to safety requirements, for which activities take place in a shipyard or other repair facility located in a NO<sub>x</sub> Tier III emission control area are temporarily exempted.
- .3 **Tier II engine operation in the NECA under the permission of the Administration in accordance with regulation 2.2 and resolution MEPC.230(65):**  
In the case of replacement engines only, if it is not possible for such a replacement engine to meet the standards set forth in paragraph 5.1.1 of this regulation (Tier III, as applicable), then that replacement engine shall meet the Tier II standard, taking into account the *2013 Guidelines as required by regulation 13.2.2 of MARPOL Annex VI in respect of non-identical replacement engines not required to meet the Tier III limit* (resolution MEPC.230(65)).

5 Notwithstanding the above possible cases, the term "certified to Tier II only" in regulation 13.5.3 may also be literally read for Tier II engines in accordance with the Tier II requirements in regulation 13.4. However, the recording requirements of the engine operating status in regulation 13.5.3 is limited only to the engine to which the Tier III standard (regulation 13.5.1) applies.

6 With a view to facilitating global and consistent implementation, in the case described in paragraph 4.3 above, IACS seeks clarification from the Sub-Committee as to whether the recording requirement in regulation 13.5.3 of MARPOL Annex VI applies to replacement engines (Tier II) subject to resolution MEPC.230(65), after the relevant NO<sub>x</sub> Tier III emission control area takes effect.

### Proposal

7 Taking into account the comments and analysis provided in paragraphs 4 to 6 above, the following draft unified interpretation with respect to regulation 13.5.3 of MARPOL Annex VI is provided for the Sub-Committee's consideration:

- .1 "marine diesel engines installed on board a ship to which paragraph 5.1 of this regulation applies" includes additional or replaced engine\* installed on or after the relevant emission control area takes effect;

\* additional or replaced engine: refer to section 7.1 of MEPC.1/Circ.795/Rev.3

- .2 "certified to Tier II only" means a Tier II engine that is installed onboard a ship which is constructed on or after the emission control area where the ship is operating takes effect [or replaced engines subject to resolution MEPC.230(65)];
- .3 Tier II engines stipulated under the Tier II requirement of regulation 13.4, i.e. Tier II engines installed onboard a ship constructed before the entry into force of the emission control area where the ship is operating, are not considered to be a "Tier II only" engine in the context of record keeping. [Such exclusion is extended to Tier II engines replaced after the entry into force of the relevant emission control areas onboard ships of this category, if the replacement engines meet resolution MEPC.230(65)];
- .4 if an engine installed on a ship constructed before the entry into force of the emission control area where the ship is operating has undergone a major conversion as described in regulation 13.2.1, those engines are to be Tier III engines; thus the above interpretation in .1 above applies; and
- .5 recording is required for the Tier II engine operation in a NECA under the exemption according to regulation 13.5.4.

### Action requested of the Sub-Committee

8 The Sub-Committee is invited to consider the foregoing, in particular the proposal provided in paragraph 7 above, and take action as appropriate.