



DEPARTMENT OF ECONOMIC DEVELOPMENT

### **MARPOL ANNEX VI - NO<sub>x</sub> Technical Code 2008.**

This Notice is relevant to vessels with engines using the engine parameter check method in accordance with Chapter 6.2 of the NO<sub>x</sub> Technical Code 2008 and provides clarification on recording like-for-like changes.

Documents referred to in this notice:

NO<sub>x</sub> Technical Code 2008. ("the Code")

Most regulations and notices are available on the Isle of Man Government website: [www.iomshipregistry.com](http://www.iomshipregistry.com) or by contacting [marine.survey@gov.im](mailto:marine.survey@gov.im)

#### **1. MARPOL Requirements.**

- 1.1. On 01 July 2010 amendments made to the NO<sub>x</sub> Technical Code came into force.
- 1.2. Chapter 6.2.2.7 of the Code describes documentation required in relation to the on-board NO<sub>x</sub> verification procedures, and one of the changes relates to the information to be recorded in the Record Book of Engine Parameters.
- 1.3. This now requires a vessel to have:
  - 1.3.1. A Record Book of Engine Parameters for recording all changes, including like-for-like replacements, and adjustments within the approved ranges made relative to an engine's components and settings; and
  - 1.3.2. Any replacements or adjustments to parts and equipment<sup>1</sup>, including normal maintenance of those parts and equipment considered to influence the NO<sub>x</sub> emission levels must be recorded in this book.
- 1.4. The aim of recording these changes is to maintain a historical record of changes to those parts and equipment considered to influence the NO<sub>x</sub> emissions from the engine.
- 1.5. This will assist in determining if there are likely to be any deviations from the specifications contained within the engine's Technical File and any potential change in the NO<sub>x</sub> emissions from that engine.

#### **2. Isle of Man Position.**

- 2.1. The Ship Registry has had concerns raised by some operators that most Safety Management Systems already require like-for-like replacements to be recorded in the vessel's Planned Maintenance System.
- 2.2. In order to avoid unnecessary duplication the Ship Registry has taken the following position on these requirements:
  - 2.2.1. Any changes affecting the designated engine parameters, including adjustments, parts replacements (with parts with a different IMO number from the original part) and modifications to engine parts, must be recorded

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<sup>1</sup> Those parts or equipment listed in the engines Technical File as required by Chapter 2.3.4 of the Code

chronologically in the record book of engine parameters. These descriptions shall be supplemented with any other applicable data used for the assessment of the engine's NO<sub>x</sub> emissions.

2.2.2. Like-for-like replacements (i.e. injector changes for identical injectors with the same IMO number) and adjustments within the approved ranges have to be recorded. However the Ship Registry will accept alternative methods of recording these changes such as in the vessel's computer based planned maintenance system. This acceptance is on condition that the following requirements are met:

2.2.2.1. The information is readily available during surveys or audits by the Isle of Man Ship Registry, Classification Society, Port State Control or other interested parties.

2.2.2.2. The record book of engine parameters states where the information can be found. Procedures should also be stated in the vessel's Safety Management System.

2.2.2.3. A copy is produced to be retained with the Record Book of Engine Parameters when the vessel is sold, changes Technical Manager, or any other reason when the original information will not be retained on the vessel.

#### Isle of Man Ship Registry

*Please note - The Isle of Man Ship Registry cannot give Legal Advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.*