

Isle of Man Ship Registry Technical Advisory Notice

EGCS – Approval Process and Guidance in Case of Failure

Ref. 010-19
Issued 23 Dec 2019

1. EGCS – Process for Approval as Equivalent Means of Compliance

Further to [TAN 005-19](#), the Isle of Man accepts Exhaust Gas Cleaning Systems (EGCS) as an equivalence to MARPOL Annex VI Regulation 14 provided that they are in accordance with IMO guidelines (MEPC.259(68)). Ship owners wishing to make use of this provision should follow the procedure stated below:

- 1) The owner arranges the EGCS to be approved by an RO in accordance with MEPC.259(68).
- 2) The RO is authorised to issue a short term IAPP noting the equivalence and the EGCS may then be put into service.
- 3) As soon as possible during the period of the short-term IAPP, the RO should send an application for the equivalence to the Ship Registry. This should include as a minimum:
 - Class Approval Letter;
 - Short-Term IAPP Certificate and Supplement; and
 - The required documents specified under paragraph 2.3 of MEPC.259(68).
- 4) The Ship Registry will review the application, and if acceptable, advise the International Maritime Organisation (IMO) via an entry to the Global Integrated Shipping Information System (GISIS). Once complete, we shall advise the RO.
- 5) When Nitrate Analysis is completed to the satisfaction of the RO, a full-term IAPP certificate can be issued.

Alternatively, the owner may elect not to have a short term IAPP; in this case compliant fuel must be used until both the nitrate analysis and notification to IMO is complete and the IAPP certificate is amended to note the equivalent arrangement.

2. EGCS Malfunction

In case of EGCS malfunction, the guidance in MEPC.1/Circ.883 should be followed. This is summarised as follows:

- Follow the trouble-shooting process specified by the EGCS manufacturer
- Record the malfunction in the EGCS Record Book
- If the system malfunction cannot be rectified within one hour, the vessel should switch to compliant fuel. If the ship does not have compliant fuel, an action plan shall be formulated and communicated to the Ship Registry and the local authorities where the ship is located.

In the case of short-term exceedances or sensor failure, please refer to MEPC.1/Circ.883.

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.

