

Isle of Man Ship Registry Technical Advisory Notice

Electronic MARPOL Record Books

Ref. 008-20
Issued 22/12/2020

This Notice applies to operators of Isle of Man registered ships who wish to use electronic MARPOL record books on their ships. The list of record books that this Notice applies to is stated in the Annex.

From 1 October 2020, amendments to MARPOL Annex I, II, V, VI and the NOx Technical code permit the use of electronic record books. The Ship Registry has received enquiries from clients who wish to use electronic record books and from companies requesting their systems to be approved for use on Isle of Man registered vessels. The Isle of Man Ship Registry has delegated the approval of electronic MARPOL record books to Recognised Organisations (ROs) and the RO will verify the electronic record book meets the requirements stated in IMO Resolution MEPC.312(74).

1. Approval of electronic MARPOL record books

If a client wishes to use an electronic record book they must ensure the following procedure has been followed:

1. The generic system must have been approved by an IoM authorised RO (see [MSN 020](#)) or a member of the Red Ensign Group (in most cases this will be by a RO); and
2. The RO classing the ship and issuing the MARPOL certificates must be contacted in order to arrange for the system to be accepted for use onboard the ship. The RO will verify the system has been installed correctly on the ship, including anything ship-specific such as back-up systems. If satisfied the system is acceptable, the ship's RO will issue a Declaration of MARPOL Electronic Record Book to the ship. This Declaration must be retained onboard as evidence that the system has been accepted.

2. Electronic signatures, storage of data and offline records

MEPC.312(74) requires electronic signatures, storage data and offline records to be determined by the Administration. The Ship Registry's policy on these areas is as follows:

1. Electronic signatures

MEPC.312(74) requires electronic signatures applied to an electronic record book to meet authentication standards, as adopted by the Administration.

There are many different standards for electronic signatures and a standard has to be chosen that ensures the signature is secure and tamper-proof.

The Isle of Man has adopted the advanced electronic signature standard that is stated in the European eIDAS Regulations.



The advanced standard serves two main purposes. It makes it possible to verify if:

1. the signer of the document is known and trusted (authenticity); and
2. the document has been altered since signed (to prevent tampering).

In order to achieve this, an advanced electronic signature must meet the following requirements:

1. it is uniquely linked to the signatory;
2. it is capable of identifying the signatory;
3. it is created using electronic signature creation data that the signatory can, with a high level of confidence, use under their sole control; and
4. it is linked to the data signed therewith in such a way that any subsequent change in the data is detectable.

The company submitting their electronic MARPOL record book for approval, must be able to demonstrate to the RO carrying out the approval, that the points listed above have been met.

3. Storage of data and offline records

MEPC.312(74) requires the electronic record book to have an appropriate method for backing up data and data recovery if the system were to fail or not be available from the ships' network. Paragraph 4.4.4 states:

"This offline record may be provided in any format deemed appropriate by the Administration and should be digitally signed by the master."

The Ship Registry's policy is companies must determine their offline storage requirements and back up facilities which must ensure the information is stored for the minimum time period required by the relevant MARPOL Annex. This will be reviewed as part of the overall approval process which has been delegated to ROs. Any digital signatures used shall also be in compliance with the eIDAS advanced standard.

4. Further reading

- Resolution MEPC.312(74): Guidelines for the use of electronic record books under MARPOL; and
- eIDAS: Regulation (EU) on electronic identification and trust services for electronic transactions in the internal market adopted on 23 July 2013.

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.



Annex

This Notice is applicable to the use of the following electronic record books and recording requirements under the MARPOL Annexes and the Technical Code on Control of Emission of Nitrogen Oxides from Marine Diesel Engines (NOx Technical Code):

1. Oil Record Book, parts I and II (MARPOL Annex I, regulations 17.1 and 36.1);
2. Cargo Record Book (MARPOL Annex II, regulation 15.1)
3. Garbage Record Book, parts I and II (MARPOL Annex V, regulation 10.3);
4. Ozone-depleting Substances Record Book (MARPOL Annex VI, regulation 12.6)
5. Recording of the tier and on/off status of marine diesel engines (MARPOL Annex VI, regulation 13.5.3);
6. Record of Fuel Oil Changeover (MARPOL Annex VI, regulation 14.6; and
7. Record Book of Engine Parameters (NOx Technical Code, paragraph 6.2.2.7).

