

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. For ships with a keel laid date of 1st June 2022 or after, or retrofitted EGCS installed on or after this date, the relevant guidelines are MEPC.340(77). For EGCS installed before this date, but after 15th May 2015 the relevant guidelines are 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.340(77).
- 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 Table 4 of MEPC.340(77).
- 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.



3. Tonnage Recalculation

Where an EGCS is retrofitted to a vessel, tonnage must be re-measured following any changes to enclosed spaces which may occur as a result. If these changes do not constitute an increase or decrease of more than 1% of the gross tonnage, the owner of the vessel may elect to either;

- a) Note the change as an annotation on the current ITC; or
- b) Request a new ITC be issued noting the change;

In either case the ITC shall retain the existing tonnage figures. If any change, or the cumulative effects of multiple changes exceed more than 1% increase or decrease of the gross tonnage stated on the ITC, then the tonnage shall be recalculated and the new figure should be used on the Tonnage Certificate and all other Convention certificates

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.

