Isle of Man Ship Registry Technical Advisory Notice



RO Delegations for EEXI & CII

Ref. TAN 007-22 Issued: 22/09/2022

This notice is published to clarify the Ship Registry's policy on delegations to Recognised Organisations for work required to comply with the new EEXI and CII. Please see <u>TAN 004-21</u> for additional background information and the application of these regulations.

1. EEXI Verification

The authorisation for verification of EEXI extends to all vessels irrespective of being classed with the RO, provided that:

- a. the verification is carried out with the agreement of the RO which classes the vessel who have been authorised for issuing the International Energy Efficiency Certificate for ensuring clarity on respective responsibilities.
- b. the verification is limited to reviewing the EEXI Technical File and the estimated speed power curve obtained from the tank test and/or numerical calculations and/or the sea trial results calibrated by the tank test in accordance with the EEDI Survey and Certification Guidelines (MEPC.333(76)).
- c. where an overridable Shaft/Engine Power Limitation system is installed, the verification would not confirm that the system is appropriately installed and sealed on board in accordance with Guidelines on the Shaft / Engine Power Limitation system to comply with the EEXI requirements and use of a power reserve (MEPC.334(76)) and that a verified Onboard Management Manual (OMM) for overridable Shaft / Engine Power Limitation is on board the ship. This onboard verification task would be performed by the RO that classes the vessel; and
- d. the RO performing the verification notifies the Ship Registry prior to commencing the verification process.

2. CII/SEEMP Part III

The authorisation for verification of Carbon Intensity Indicator (CII) under MARPOL VI/26 and approval of SEEMP Part III under MARPOL VI/28 extend to the respective RO who has additionally taken on the responsibility for IMO Data Collection System (DCS) for Fuel Oil Consumption of those ships, i.e. the DCS and CII verifications, and issuance of Statement of Compliance for a vessel must be carried out by the same RO irrespective of whether that RO has classed the vessel.

This permission is subject to that RO taking full legal responsibility for the whole of the DCS, CII and SEEMP PIII work, or the ship owner ensuring an agreement exists between the DCS/CII RO and the ships' primary RO as to who owns responsibility for the shipboard elements of the DCS and CIII work and related certifications. We would emphasise the importance of the owner having documented, legal clarity as to who takes responsibility for each element.

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.

