



Guidance to assist with preparations for the Concentrated Inspection Campaign (CIC) on MARPOL Annex VI

Introduction

The Paris MoU and Tokyo MoU will conduct a Concentrated Inspection Campaign (CIC) on MARPOL Annex VI from 1 September to 30 November 2018. MARPOL Annex VI concerns the prevention of air pollution from ships, including regulation of the emissions of nitrogen oxides (NO_x), sulphur oxides (SO_x), ozone depleting substances (ODS) and volatile organic compounds (VOCs).

Other PSC MoUs have indicated that they will also conduct CICs on MARPOL Annex VI in 2018, such as the Black Sea MoU and Indian Ocean MoU. It is anticipated that they will use the same standard questionnaire.

CICs are an annual initiative of the regional PSC regimes which are designed to focus inspections on specific topics where high levels of deficiencies have been encountered by PSCOs, or where new international regulatory requirements have recently entered into force.

This document provides guidance and information on the CIC on MARPOL Annex VI. It has been developed to assist shipowners and operators prepare for PSC inspections involving the CIC. Specific information and guidance is provided for each question on the standard questionnaire developed by the Paris MoU and Tokyo MoU. It should not be seen, in any way, as superseding or replacing relevant guidance provided by flag States, or any other preparations for PSC inspections.

The results of the CIC are expected to be released by the Paris MoU and Tokyo MoU in mid-2019, and will likely be reported to the IMO with any recommendations.

Applicability of the CIC

The CIC will, in whole or in part, be applicable to all ships, and will be conducted on all ships eligible or due for PSC inspection in ports in the Paris MoU and Tokyo MoU regions during the period of the CIC. Ships are expected to be targeted for inspection in accordance with the normal approaches used by national PSC authorities. CICs are typically combined with a regular PSC inspection of a ship, and it should be noted that the focus of this CIC does not preclude the inspection for compliance with other requirements of MARPOL or any other applicable statutory instrument. Ships should only be subject to one PSC inspection involving the CIC.

Standard questionnaire for the CIC

A standard questionnaire has been developed and released by the Paris MoU and Tokyo MoU for use by PSCOs during the CIC. It was issued by a joint press release on 1 August 2018, and a copy of it is included on page 3 of this document.

Each of the questions require a “Yes”, “No” or “Not Applicable” answer to be recorded by the PSCO. Where a “No” is recorded, a relevant deficiency will be recorded in the report of the inspection. If a “NO” is recorded for questions marked with an “*”, the ship may be considered for detention.

Relevant IMO instrument

International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocols of 1978 and 1997 relating thereto (MARPOL)

Relevant IMO guidance

| | |
|-------------------------|--|
| Resolution MEPC.282(70) | Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP) |
| Resolution MEPC.259(68) | Guidelines for exhaust gas cleaning systems |
| Resolution MEPC.243(66) | Guidelines on the approved method process |
| Resolution MEPC.185(59) | Guidelines for the development of a VOC Management Plan |
| Resolution MEPC.181(59) | Guidelines for port State control under the revised MARPOL Annex VI |
| MEPC.1/Circ.680 | Technical Information on Systems and Operation to Assist Development of VOC Management Plans |

Disclaimer

This document is intended as voluntary advice which shipowners and operators are not in any way obligated to accept, although they are invited to consider its value in the context of their preparations for the Concentrated Inspection Campaign (CIC) on MARPOL Annex VI being held from 1 September to 30 November 2018.

While the information in this document has been developed using the best information sources currently available, it is intended purely as information and guidance to be used at the user's own risk. No responsibility is accepted by ICS or by any person, firm, corporation or organisation who or which has been in any way concerned with the furnishing or supply of information, compilation, publication or authorised translation of this information, for the accuracy of the information herein, or for any omission or for any consequences whatsoever resulting directly or indirectly from using the information contained herein even if caused by want of due diligence or reasonable care.



CIC on MARPOL ANNEX VI

| | | | |
|-----------------------|--|------------------|--|
| Inspection Authority: | | | |
| Ship Name: | | IMO Number: | |
| Date of Inspection: | | Inspection Port: | |

| | Questions | Yes | No | N/A |
|----|--|-----|----|-----|
| 1 | Are bunker delivery notes, with details of fuel oil for combustion purposes, kept available on board for the required period of 3 years? Annex VI, regulation 18.5 and 18.6 | | | |
| 2* | Do bunker delivery notes indicate that fuel oils delivered and used on board is not exceeding the maximum allowed sulphur content, as appropriate? Annex VI, regulation 14.1.2 and 14.4.3 | | | |
| 3 | Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.1% m/m in fuel oil while operating in SOx emission control areas, have a written procedure showing how fuel oil change-over is to be done for achieving compliance with the above requirements when entering SOx emission control areas? Annex VI, regulation 14.6 | | | |
| 4* | Are alternative arrangements, (e.g. scrubbers) installed on board according to regulation 4.1 approved by the flag State? Annex VI, regulation 4.1 | | | |
| 5 | Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.10% m/m in fuel oil and entering or leaving SOx emission control areas, record detailed information showing that the ship has completed/initiated the change-over in the logbook prescribed by the Administration? Annex VI, regulation 14.6 | | | |
| 6 | Do ships which have rechargeable systems containing ozone-depleting substances (refer to the supplement to the IAPP Certificate, item 2.1), have the ozone-depleting substances record book maintained? Annex VI, regulation 12.6 | | | |
| 7 | Where an Approved Method in accordance with Annex VI, regulations 13.7.1-13.7.5 (refer to the supplement to the IAPP Certificate, item 2.2.1) is installed, has such an installation been confirmed by a survey using the verification procedure specified in the Approved Method File, including appropriate notation on the ship's International Air Pollution Prevention Certificate of the presence of the Approved Method? Annex VI, regulation 13.7.1.1 | | | |
| 8 | For ships equipped with a shipboard incinerator or thermal waste treatment device installed as an alternative arrangement, is the ship's crew responsible for the operation of the equipment familiar with, properly trained in, and capable of implementing the guidance provided in the manufacturer's operating manual? Annex VI, regulation 16.8 | | | |
| 9* | Are the master and crew familiar with essential shipboard procedures in the approved VOC Management Plan relating to the prevention of air pollution from ships? Annex VI, regulation 15.6 | | | |
| 10 | Does the ship keep on board a Ship Energy Efficiency Management Plan (SEEMP)? Annex VI, regulation 22 paragraph 1 | | | |
| 11 | Was the ship detained as a result of the Inspection Campaign? | | | |

Note: Questions 1 to 10 answered with a "NO" MUST be accompanied by a relevant deficiency on the Report of Inspection.

If the box "NO" is ticked off for questions marked with an "*", the ship may be considered for detention.

Question 1

“Are bunker delivery notes, with details of fuel oil for combustion purposes, kept available on board for the required period of 3 years?”

This question addresses the requirement for bunker delivery notes to be kept on board for three years.

Requirements related to bunker delivery notes are set out in regulations 18.5 and 18.6, and Appendix V, of MARPOL Annex VI.

Details of fuel oil for combustion purposes delivered to and used on board a ship are required to be recorded by means of a bunker delivery note. A bunker delivery note is required:

- To contain at least the information specified in Appendix V of MARPOL Annex VI;
- Be retained for a period of three years after the fuel oil has been delivered on board; and
- Be kept on board in such a place as to be readily available for inspection at all reasonable times.

These requirements are applicable to all ships of 400 gross tonnage or above and, at the flag State's discretion, to ships of less than 400 gross tonnage.

Preparations

Ships should ensure that:

- Bunker delivery notes have been retained for all bunkering operations in the last three years; and
- Bunker delivery notes from the last three years are on board.

Inspection

Ships should be prepared to show the PSCO:

- Bunker delivery notes for all bunkering operations in the last three years.

Additional comment

Masters should verify that the bunker delivery notes that have been retained on board from all bunkering operations over the last three years correspond to relevant records in the ship's Oil Record Book.

Question 2

“Do bunker delivery notes indicate that fuel oils delivered and used on board is not exceeding the maximum allowed sulphur content, as appropriate?”

This question addresses the requirements related to the maximum sulphur content of any fuel oil used on board ships, which will be indicated on the bunker delivery notes.

Requirements related to the maximum sulphur content of any fuel oil used on board ships are set out in regulations 14.1.2 and 14.4.3 of MARPOL Annex VI, and requirements related to bunker delivery notes are set out in regulations 18.5 and 18.6, and Appendix V, of MARPOL Annex VI.

The sulphur content of any fuel oil used on board ships is not to exceed 3.50% m/m, and while ships are operating within an Emission Control Area (ECA), the sulphur content of fuel oil used on board ships is not to exceed 0.10% m/m.

Preparations

Ships should ensure that:

- Fuel oil suppliers have documented the sulphur content of the fuel oil delivered to the ship on the bunker delivery notes provided to the ship; and
- Sulphur content of the fuel oils documented on the bunker delivery notes is appropriate to where the ship operates (0.10% m/m for operating in an ECA and 3.50% m/m when operating elsewhere).

Inspection

Ships should be prepared to show the PSCO:

- Bunker delivery notes for all bunkering operations; and
- For ships entering or leaving an ECA, relevant records of fuel oil change-overs from the logbook prescribed for that purpose by the flag State.

If a “No” is recorded by the PSCO for this question, the ship may be considered for detention.

Additional comment

Masters of ships using an equivalent means of compliance (e.g. scrubbers) should expect to provide evidence (i.e. International Air Pollution Prevention (IAPP) Certificate) that ship has received an appropriate approval from the flag State.

Question 3

“Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.1% m/m in fuel oil while operating in SOx emission control areas, have a written procedure showing how fuel oil change-over is to be done for achieving compliance with the above requirements when entering SOx emission control areas?”

This question addresses ships using separate fuel oils to comply with the maximum sulphur content requirements while operating within an Emission Control Area (ECA).

Requirements related to using separate fuel oils while operating within an ECA are set out in regulation 14.6 of MARPOL Annex VI.

Ships using separate fuel oils to comply with the maximum sulphur content requirements for operating within an Emission Control Area (ECA) are required:

- To carry a written procedure showing how the fuel oil change-over is to be done; and
- To allow sufficient time for the fuel oil service system to be fully flushed of all fuel oils exceeding 0.10% m/m prior to entry into an ECA.

Preparations

Ships should ensure that:

- A written procedure is carried on board that shows how the fuel oil change-over is to be done;
- The procedure should allow sufficient time for the fuel oil service system to be fully flushed of all fuel oils exceeding 0.10% m/m prior to entry into an ECA.

Inspection

Ships should be prepared to show the PSCO:

- The written procedures carried on board that shows how the fuel oil change-over is to be done.

Question 4

“Are alternative arrangements, (e.g. scrubbers) installed on board according to regulation 4.1 approved by the flag State?”

This question addresses the equivalent means of compliance that flag States may approve.

Requirements related to equivalents are set out in regulation 4 of MARPOL Annex VI.

A flag State may allow any fitting, material, appliance or apparatus to be fitted in a ship or other procedures, alternative fuel oils, or compliance methods used as an alternative to that required by MARPOL Annex VI, if such fitting, material, appliance or apparatus or other procedures, alternative fuel oils, or compliance methods are at least as effective in terms of emissions reductions as required by MARPOL Annex VI, including any requirements on nitrogen oxides (NO_x), sulphur oxides (SO_x) and particulate matter.

Preparations

Masters should determine if the question is applicable by confirming whether the ship is using an equivalent means of compliance (e.g. exhaust gas cleaning systems (scrubbers)).

If the question is applicable, ships should ensure that:

- The equivalent means of compliance with MARPOL Annex VI has been approved by the flag State.
- The approval of the flag State is specified in the International Air Pollution Prevention (IAPP) Certificate in section 2.6 of its Supplement.

Inspection

If the question is applicable, ships should be prepared to show the PSCO:

- The ship's IAPP Certificate, including its Supplement.

If a “No” is recorded by the PSCO for this question, the ship may be considered for detention.

Additional comment

Masters should be prepared to provide, if necessary, any other documentation related to the equivalent means of compliance with MARPOL Annex VI, such as the SO_x Emission Compliance Plan (SECP), SO_x Emissions Compliance Certificate (SECC), EGCS Technical Manual (ETM), Onboard Monitoring Manual (OMM), etc.).

Question 5

“Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.10% m/m in fuel oil and entering or leaving SOx emission control areas, record detailed information showing that the ship has completed/initiated the change-over in the logbook prescribed by the Administration?”

This question addresses the records being kept about fuel oil change-overs when entering or leaving Emission Control Areas (ECA).

Requirements related to keeping records on board ship about the use of separate fuel oils are set out in regulation 14.6 of MARPOL Annex VI.

Ships using separate fuel oils to comply with the maximum sulphur content requirements for operating within an Emission Control Area (ECA) are required to record the:

- Volume of low sulphur fuel oils in each tank; and
- Date, time and position of the ship when any fuel oil change-over operation is completed prior to the entry into an ECA or commenced after exit from an ECA.

Records should be kept in a logbook as prescribed by the flag State.

Preparations

Masters should determine if the question is applicable by confirming whether using separate fuel oils to comply with the maximum sulphur content requirements for operating within an ECA.

If the question is applicable, ships should ensure that:

- The logbook for keeping records about the use of separate fuel oils is as prescribed by the flag State;
- Records have been kept in the logbook of all fuel oil change-overs when entering or leaving ECAs;
- Records include, as a minimum, the volume of low sulphur fuel oils in each tank and the date, time and position of the ship when any fuel oil change-over operation was completed prior to the entry into an ECA or commenced after exit from an ECA.

Inspection

If the question is applicable, ships should be prepared to show the PSCO:

- The logbook prescribed by the flag State for keeping records about the use of separate fuel oils.

Question 6

“Do ships which have rechargeable systems containing ozone-depleting substances (refer to the supplement to the IAPP Certificate, item 2.1), have the ozone-depleting substances record book maintained?”

This question addresses ships with rechargeable systems that contain ozone depleting substances (ODS).

Requirements for ships with rechargeable systems that contain ozone depleting substances and need to maintain an Ozone Depleting Substances (ODS) Record Book are set out in regulation 12.6, and Appendix I, of MARPOL Annex VI.

This requirement is only applicable to ships that are required to have an International Air Pollution Prevention Certificate (IAPP) Certificate, and have rechargeable systems that contain ODS.

Ships with rechargeable systems that contain ODS are required to maintain an ODS Record Book. It may form part of an existing logbook or electronic recording system as approved by the flag State. Entries in the ODS Record Book are required to be recorded in terms of mass (kg) of substance and to be completed without delay on each occasion, in respect of the following:

- Recharge, full or partial, of equipment containing ODS;
- Repair or maintenance of equipment containing ODS;
- Discharge of ODS to the atmosphere:
 - Deliberate; and
 - Non-deliberate;
- Discharge of ODS to land-based reception facilities; and
- Supply of ODS to the ship.

Preparations

Ships should ensure that:

- If the Supplement to its IAPP Certificate specifies that the ship has rechargeable systems that contain ODS, it has an ODS Record Book;
- The ODS Record Book is in a form approved by the flag State;
- Entries in the ODS Record Book include the information stipulated by regulation 12.7 of MARPOL Annex VI.

Inspection

Ships should be prepared to show the PSCO:

- The ship’s ODS Record Book.

Additional comment

Masters should expect PSCOs to seek to check the inventory of ODS remaining on board in order to verify they correspond to the entries in the ODS Record Book.

Question 7

“Where an Approved Method in accordance with Annex VI, regulations 13.7.1-13.7.5 (refer to the supplement to the IAPP Certificate, item 2.2.1) is installed, has such an installation been confirmed by a survey using the verification procedure specified in the Approved Method File, including appropriate notation on the ship’s International Air Pollution Prevention Certificate of the presence of the Approved Method?”

This question addresses ships where an Approved Method has been applied to their marine diesel engines.

Requirements related to the installation of an Approved Method are set out in regulation 13.7.1 to 13.7.5, and Appendix I, of MARPOL Annex VI.

This requirement is only applicable to ships with marine diesel engines with a power output of more than 5,000 kW and a per cylinder displacement at or above 90 litres installed on a ship constructed on or after 1 January 1990 but prior to 1 January 2000.

A marine diesel engine with a power output of more than 5,000 kW and a per cylinder displacement at or above 90 litres installed on a ship constructed on or after 1 January 1990 but prior to 1 January 2000 is required to comply with the specified emission limits, provided that an Approved Method for that engine has been certified by an Administration of a Party to MARPOL Annex VI.

Compliance with this requirement can be demonstrated through one of the following:

- Installation of the certified Approved Method, as confirmed by a survey using the verification procedure specified in the Approved Method File, including appropriate notation on the ship’s International Air Pollution Prevention (IAPP) Certificate of the presence of the Approved Method; or
- Certification of the engine confirming that it operates within the limits set forth for Tier I, Tier II or Tier III marine diesel engines, and an appropriate notation of the engine certification on the ship’s IAPP Certificate.

Section 2.2.1 of the Supplement to the IAPP certificate will provide information about whether an Approved Method is installed on a ship, not commercially available, or not applicable. Where a ship has had an Approved Method installed, it will have an Approved Method File on board. A chronological record is to be maintained, covering the installation of the Approved Method and all changes, including like-for-like replacements, of components and adjustments/operating values as covered by the Approved Method. This record is to accompany the Approved Method File as evidence of the initial installation.

Preparations

Masters should determine if this question is applicable to the ship by checking whether:

- The ship has a marine diesel engines with a power output of more than 5,000 kW and a per cylinder displacement at or above 90 litres installed on a ship constructed on or after 1 January 1990 but prior to 1 January 2000; and
- The IAPP Certificate has a notation of the presence of an Approved Method in section 2.2.1 of its Supplement).

If the question is applicable, ships should ensure that:

- The Supplement to the IAPP Certificate has a notation of the presence of the Approved Method in section 2.2.1.

Inspection

If the question is applicable, ships should be prepared to show the PSCO:

- IAPP Certificate and its Supplement; and
- Approved Method File.

Additional comments

If Masters determine that the ship has a marine diesel engines with a power output of more than 5,000 kW and a per cylinder displacement at or above 90 litres installed on a ship constructed on or after 1 January 1990 but prior to 1 January 2000, but an Approved Method has not been installed, it will be because:

- The engine has been certified confirming that it operates within the limits set forth for Tier I, Tier II or Tier III marine diesel engines;
- An Approved Method is not yet commercially available; or
- An Approved Method is not applicable.

These circumstances can be confirmed and evidenced as follows:

- If certified as compliant with NOx Tier I, Tier II or Tier III, this will be indicated in section 2.2. 1 of the Supplement to the IAPP Certificate;
- If an Approved Method is “not commercially available”, this will be indicated in section 2.2. 1 of the Supplement to the IAPP Certificate, and a statement to that effect should be duly provided by the flag State to the shipowner, which should be retained on board; and
- If an Approved Method is “not applicable”, this will be indicated in section 2.2.1 of the Supplement to the IAPP Certificate, and there will be documentation provided by an Administration of a Party to MARPOL Annex VI with the concurrence of the ship’s flag State, documenting that non-applicability, which should be retained on board as evidence of non-applicability of a particular Approved Method.

Question 8

“For ships equipped with a shipboard incinerator or thermal waste treatment device installed as an alternative arrangement, is the ship’s crew responsible for the operation of the equipment familiar with, properly trained in, and capable of implementing the guidance provided in the manufacturer’s operating manual?”

This question addresses the familiarization and training of personnel with shipboard incinerators or thermal waste treatment devices (where installed as an alternative design).

Requirements related to shipboard incineration are set out in regulation 16 and Appendix IV of MARPOL Annex VI.

Incinerators on ships constructed on or after 1 January 2000, or incinerators which are installed on board ships on or after 1 January 2000, are required to meet the requirements contained in Appendix IV to Annex VI. Each incinerator subject to this subparagraph shall be approved by the Administration taking into account the standard specification for shipboard incinerators developed by IMO.

Incinerators are required to have a manufacturer’s operating manual which is to be retained with the unit and specify how to operate the incinerator within the limits described in Appendix IV to MARPOL Annex VI.

Personnel responsible for the operation of an incinerator are required to be trained to implement the guidance provided in the manufacturer’s operating manual for the incinerator.

Preparations

Ships should ensure that:

- Personnel responsible for the operation of the incinerator (or thermal waste treatment device) have been familiarized with the equipment and are capable of implementing the guidance provided in the manufacturer’s operating manual for the equipment;
- Records are kept on board of the familiarization of relevant personnel; and
- Personnel responsible for the operation of the incinerator (or thermal waste treatment device) are able to locate the manufacturer’s operating manual for the equipment.

Inspection

Ships should be prepared to show the PSCO:

- Records of the familiarization of relevant personnel;

Personnel responsible for the operation of the incinerator (or thermal waste treatment device) should be prepared to demonstrate their familiarity with equipment and the guidance provided in the manufacturer’s operating manual for the equipment.

Question 9

“Are the master and crew familiar with essential shipboard procedures in the approved VOC Management Plan relating to the prevention of air pollution from ships?”

This question addresses the procedures for minimizing the volatile organic compound (VOC) emissions.

Requirements related to VOC emissions are set out in regulation 15.6 of MARPOL Annex VI.

This requirement is only applicable to ships that have a VOC Management Plan (tankers carrying crude oil and gas carriers where the type of loading and containment systems allow safe retention of non-methane VOCs on board or their safe return ashore).

A tanker carrying crude oil is required to have on board and implement a VOC Management Plan approved by the flag State. The plan is specific to the ship and it is required at least to:

- Provide written procedures for minimizing VOC emissions during the loading, sea passage and discharge of cargo;
- Give consideration to the additional VOC generated by crude oil washing; and
- Identify a person responsible for implementing the plan.

Preparations

Masters should determine if this question is applicable to the ship by confirming whether the ship is required to have a VOC Management Plan.

If the question is applicable, ships should ensure that:

- There is an approved VOC Management Plan on board;
- There is a person designated as responsible for implementing the VOC Management Plan, and the Master and relevant personnel are familiarized with the procedures described in the VOC Management Plan.

Inspection

If the question is applicable, ships should be prepared to show the PSCO:

- An approved VOC Management Plan;

Masters and relevant personnel should be prepared to demonstrate their familiarity with the VOC Management Plan, including the ship’s procedures for minimizing VOC emissions during the loading, sea passage and discharge of cargo, and during crude oil washing.

If a “No” is recorded by the PSCO for this question, the ship may be considered for detention.

Question 10

“Does the ship keep on board a Ship Energy Efficiency Management Plan (SEEMP)?”

This question addresses the Ship Energy Efficiency Management Plan (SEEMP).

Requirements related to the SEEMP are set out in regulation 22 of MARPOL Annex VI.

Each ship is required to keep on board a ship specific Ship Energy Efficiency Management Plan (SEEMP), which may form part of the ship's Safety Management System (SMS).

Preparations

Ships should ensure that:

- There is a ship-specific SEEMP, which may form part of the ship's SMS.

Inspection

Ships should be prepared to show the PSCO:

- The SEEMP for the ship.

Additional comment

Masters should be prepared to advise the PSCO that they should not be checking the contents of the SEEMP, and that there is no requirement for a ship's SEEMP to be in a language understood by the PSCO.