Subject

Application of Amendments to MARPOL ANNEX VI (Regulations on energy efficiency for ships) to ships without means of propulsion



No. TEC-0955 Date 3 July 2013

To whom it may concern

As already advised in ClassNK Technical Information No. TEC-0929, with respect to ships required to keep on board a Ship Energy Efficiency Management Plan (SEEMP), such ships exclude platforms (including FPSOs and FSUs) and drilling rigs in accordance with the IMO unified interpretation.

With regard to the above unified interpretation, it was agreed at the 65th session of the Marine Environment Protection Committee (MEPC 65) held in May 2013 that ships without means of propulsion such as barges were also excluded from the ships required to keep on board a SEEMP.

Please be advised that, except for Japanese flagged ships*, the above types of ships are not required to have SEEMP and International Energy Efficiency Certificate (IEE Certificate) from now on.

*At present, Japanese flagged ships are required to have SEEMP and IEE Certificate even in the case of the above types of ships.

Please refer to the attached MEPC.1/Circ.814 regarding the IMO unified interpretation to the regulation of the SEEMP.

For any questions about the above, please contact:

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Attachment:

1. MEPC.1/Circ.814

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MEPC.1/Circ.814 10 June 2013

UNIFIED INTERPRETATION TO MARPOL ANNEX VI

Ship Energy Efficiency Management Plan (SEEMP)

- 1 The Marine Environment Protection Committee, at its sixty-fourth session (1 to 5 October 2012), approved several Unified Interpretations to MARPOL Annex VI (MEPC.1/Circ.795).
- The Marine Environment Protection Committee, at its sixty-fifth session (13 to 17 May 2013), approved an amendment to the Unified Interpretation to regulations 5, 6 and 22 of MARPOL Annex VI on Ship Energy Efficiency Management Plan (SEEMP) (MEPC 65/22, paragraph 4.134.4).
- The amended Unified Interpretation to regulations 5, 6 and 22 of MARPOL Annex VI, as approved by the Committee, is set out in the annex hereto.



ANNEX

UNIFIED INTERPRETATION TO MARPOL ANNEX VI

Ship Energy Efficiency Management Plan (SEEMP)

Regulation 5

Surveys

Regulation 5.4.4 reads as follows:

".4 For existing ships, the verification of the requirement to have an SEEMP on board according to regulation 22 shall take place at the first intermediate or renewal survey identified in paragraph 1 of this regulation, whichever is the first, on or after 1 January 2013."

Regulation 6

Issue or endorsement of a Certificate

Regulation 6.4 reads as follows:

"4 An International Energy Efficiency Certificate for the ship shall be issued after a survey in accordance with the provisions of regulation 5.4 of this annex to any ship of 400 gross tonnage and above before that ship may engage in voyages to ports or offshore terminals under the jurisdiction of other Parties."

Regulation 22

Ship Energy Efficiency Management Plan (SEEMP)

Regulation 22.1 reads as follows:

"1 Each ship shall keep on board a ship-specific Ship Energy Efficiency Management Plan (SEEMP). This may form part of the ship's Safety Management System (SMS)."

Interpretation:

- 1 The International Energy Efficiency Certificate (IEEC) shall be issued for both new and existing ships to which chapter 4 of MARPOL Annex VI applies. Ships which are not required to keep an SEEMP on board are not required to be issued with an IECC.
- 2 The SEEMP required by regulation 22.1 of MARPOL Annex VI is not required to be placed on board an existing ship to which this regulation applies until such time as the verification survey specified in regulation 5.4.4 of MARPOL Annex VI is carried out.
- For existing ships, a Ship Energy Efficiency Management Plan (SEEMP) required in accordance with regulation 22 shall be verified on board according to regulation 5.4.4, and an IEEC shall be issued, not later than the first intermediate or renewal MARPOL Annex VI, chapter 2 survey, whichever is the sooner, on or after 1 January 2013, i.e. a survey connected to an intermediate/renewal survey of the IAPP Certificate.

- The intermediate or renewal survey referenced in 3 relates solely to the timing for the verification of the SEEMP on board, i.e. these IAPPC survey windows will also become the IEEC initial survey date for existing ships. The SEEMP, is however, a survey item solely under the new MARPOL Annex VI, chapter 4, and is not a survey item relating to IAPPC surveys.
- In the event that the SEEMP is not found on board during the first intermediate/renewal survey of the IAPP Certificate on or after 1 January 2013, then the RO should seek the advice of the Administration concerning the issuance of an IEEC and be guided accordingly. However, the validity of the IAPP Certificate is not impacted by the lack of a SEEMP as the SEEMP is a survey item solely under the new MARPOL Annex VI, chapter 4, and not under the IAPPC surveys.
- 6 With respect to ships required to keep on board an SEEMP, such ships exclude platforms (including FPSOs and FSUs) and drilling rigs, regardless of their propulsion, and any other ship without means of propulsion.
- 7 SEEMP should be established in a working language or languages understood by ship's personnel.