

	CIRCULAR 2012-008		
	DEPARTMENT OF MARINE SERVICES AND MERCHANT SHIPPING (ADOMS)		
	MARPOL Annex VI Records.	<table border="1"> <tr> <td style="text-align: center;">Ref</td> <td style="text-align: center;">MARPOL Annex VI</td> </tr> </table>	Ref
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Companies operating ships under the flag of Antigua and Barbuda.

Ships registered under the flag of Antigua and Barbuda.

Recognised Organisations conducting statutory certification services on behalf of Antigua and Barbuda

This Circular was previously published as Circular 03-003-2012. It is republished with minor editorial changes.

Background.

The most recent amendments to MARPOL Annex VI contain a number of requirements in so far as record keeping is concerned. There is a need to ensure that owners and ship's management teams are aware of the specific requirements of the Antigua and Barbuda Administration in respect of those requirements that are left to be prescribed by the Administration.

The changes to Annex VI affect Ozone depleting substances, VOC management, and fuel management in Emission Control Areas. In 2011 the North American Emissions Control Area, (ECA) was established and ships should take particular note of this if navigating in North American waters.

Ozone-depleting substances record book.

Revised Annex VI. – Regulation 12 - Ozone-depleting substances.

Regulation 12 of the revised Annex VI requires that from 1st July 2010 (the date of entry into force of the revised Annex) every ship that is issued with an International Air Pollution Prevention Certificate (IAPPC) which is required for ships of 400 GT or more, and that has on board any rechargeable systems that contain ozone-depleting substances must maintain an ozone-depleting substances record book.

Ozone-depleting substances are defined in the MARPOL Annex and include HALONS, commonly found as fire extinguishing gases and a number of CFCs commonly used as refrigerants.

The record book is required to be completed without delay after every occasion when ozone-depleting substances are handled or equipment containing them is repaired or maintained and it must record:

- Every recharge, (full or partial) (in kg) of equipment containing ozone-depleting substances,
- Every repair or maintenance action of equipment containing ozone-depleting substances,
- Every discharge (in kg) of ozone-depleting substances to atmosphere whether deliberate, or non-deliberate,

- Every discharge (in kg) of ozone-depleting substances to land-based reception facilities; and
- Every supply (in kg) of ozone-depleting substances to the ship.

The Annex does not specify the form of this record book and ADOMS will accept any paper based or book system that:

- Contains the data listed above including the date of the activity and the date of the entry,
- Provides for the record to be signed in the same manner as is the Oil Record Book; and,
- Has a process such as numbered pages or otherwise that demonstrates that the record is complete and continuous.

The Annex also provides that the ozone-depleting substances record book may be part of an existing logbook. The Antigua and Barbuda Administration will accept arrangements to incorporate this data in any existing log book.

The Annex also allows for an electronic system “*as approved by the Administration*”. In the case of arrangements, therefore, that use a system of electronic records for this purpose ADOMS will need to signify its approval in order to meet the Annex requirements. Approval of electronic systems, where required, is included in the current delegations to the ROs and owners who wish approval for an electronic system may approach their Classification Societies.

For guidance an electronic system may be approved by an RO on behalf of ADOMS if it:

- Contains the data listed above,
- Has a facility where the author of any entry can be identified at the time of making the entry,
- Has a back-up arrangement such that entries cannot be lost in the event of a computer failure on board,
- Has a facility to track all entries and their history, and
- Cannot be altered once entries are made.

On introducing the ozone-depleting substances record book on any ship for the first time the Administration would recommend that the initial entry records any stocks held on board at the date of first entry.

VOC management plan.

Revised Annex VI. Regulations – regulation 15 – Volatile Organic Compounds (VOCs).

The revised Annex introduces a new requirement for tankers carrying crude oil to have on board and to implement a VOC Management Plan. The VOC Management Plan is intended to be specific to each ship and to provide at least:

- Written procedures for minimising VOC emissions during loading, sea passage and discharge;
- Consideration of the additional VOCs generated during crude oil washing; and
- The identity of a person responsible for implementing the plan.

For Antigua and Barbuda ships it should be in English, but a translation into the ship's working language where the specified working language is not English should be provided. VOC Management Plans are required to be approved by the Administration and this task has been delegated to the Recognised Organisations (Classification Societies) recognised by Antigua and Barbuda who already have delegated powers under MARPOL. Owners who have prepared VOC management Plans and who wish to have them approved should approach their Class Societies for this service

Arrangements for entering emission control areas and records.

Revised Annex VI - Regulation 14.4 and 14.6

Ships that use separate fuel oils to meet the sulphur content requirements in Regulation 14.4 for operations in an emission control area (ECA) are required to have a written procedure for changing over from normal fuel to low sulphur fuel. The procedures should allow sufficient time for the system to be fully flushed and changed over prior to entry to the emission control area. The regulation requires that the operation be recorded in a log book as prescribed by the administration.

On Antigua and Barbuda ships the prescribed log book is the engine room logbook or any other separate logbook which is maintained in the engine room and kept with the engine room logbook and which records in clear terms:

- The volume of low sulphur fuel in each tank at the changeover on entry to an emission control area,
- The position, date and time of completion of changeover procedures on entry to the emission control area,
- The position, date and time of the completion of changeover procedures on leaving the emission control area, and
- The volume of low sulphur fuel in each tank on changeover when leaving the emission control area.

Owners may elect to use an electronic version of this log provided that it records the data specified above and that there are arrangements in place to prevent any change to an entry once it is made.

North American Emission Control Area.

Operators should take particular note of the North American Emission Control Area which came into force on 1st August 2011. It is expected that US ports and US PSC will take particular note of the Annex VI requirements as they apply to this area. The boundaries of the US ECA are defined in Annex VII of the revised Annex VI to MARPOL.

August 2012.