

# TECHNICAL CIRCULAR No. 300 of 05th November 2015

To:	All Surveyors/Auditors	
Applicable to flag:	All Flags	
Subject:	USE OF NATIONAL TONNAGE	
Reference:	IMO Res. A.1073(28)	

# RECOMMENDATION ON THE USE OF NATIONAL TONNAGE IN APPLYING INTERNATIONAL CONVENTIONS

#### National tonnage versus convention tonnage

National tonnage refers to the tonnage measurement of a ship under the Administration's national tonnage rules that predated the adoption of the measurement rules of the 1969 Tonnage Convention. National gross tonnage is often expressed in terms of gross registered tons (GRT). In contrast, the unit less gross tonnage measurement under the rules of the 1969 Tonnage Convention is expressed in terms of gross tonnage (GT).

#### Eligibility to use national tonnage

The 1969 Tonnage Convention and the Interim Schemes for Tonnage Measurement provide for the use of national tonnage in applying relevant requirements under international conventions to certain ships with keel laid dates on or before 18 July 19941. Further, a ship that undergoes an alteration or modification which the Administration deems to be a substantial variation in its "existing" tonnage, as described in article 3(2)(b) of the 1969 Tonnage Convention, is treated as if the date on which the alterations or modifications commenced was the keel laid date for this purpose. The following table lists the basis for use of national tonnages as a function of a ship's keel laid/substantial alteration date and its national gross tonnage.

**Customer Service Center** 

5201 Blue Lagoon Drive, 9™. Floor, Miami, Fl., 33126 Tel: 1 (305) 716 4116, Fax: 1 (305) 716 4117, E-Mail:

7111 Dekadine Ct. Spring, Tx., 77379 Tel: 1 (832) 451 0185, 1 (713) 204 6380

**Technical Head Office** 

joel@conarinagroup.com

E-Mail: cbozenovici@vcmaritime.com

Ship's Keel Laid	Ship's National Gross Tonnage		
Alteration Date	GRT<400	400 <grt<1600< td=""><td>GRT&gt;1600</td></grt<1600<>	GRT>1600
Before 18 July 1982	TM69 Art.3(2)(d)	TM69 Art.3(2)(d)	TM69 Art.3(2)(d)
18 July 1982 - 31 December 1985	A.494(XII) / A.541(13)	A.494(XII)	Not Eligible
1 January 1986 - 18 July 1994	A.494(XII) / A.541(13)	A.494(XII)	Not Eligible
After 18 July 1994	Not Eligible	Not Eligible	Not Eligible

# Basis for Using National Tonnage to Apply International Conventions

## Relevant requirements under international conventions

The term "relevant requirements under" in article 3(2)(d) of the 1969 Tonnage Convention and throughout this Recommendation refers to tonnage-based requirements for which a tonnage threshold was in effect on or before 18 July 1994, the date when the 1969 Tonnage Convention came fully into force. As such, national tonnage may not be used when applying newer tonnage thresholds in international conventions, unless otherwise provided in an international convention or other instrument. For example, for eligible ships national tonnages may be used to apply the 500 gross tonnage cargo ship exemption threshold of regulation I/3 of SOLAS, which predates 18 July 1994. However, national tonnages may not similarly be used to apply the 500 gross tonnage threshold of SOLAS regulation XI-2/2.1.1.2, which came into effect after this date2.

## **Remarks on International Tonnage Certificates (1969)**

Notwithstanding the provisions of resolutions A.494(XII) and A.541(13), which state that gross tonnage measured under the national tonnage rules shall not be shown on the International Tonnage Certificate (1969) an entry may be made under "Remarks" on the International Tonnage Certificate (1969) to reflect the shipowner's decision to use national tonnages, as follows:

.1 For ships covered by article 3(2)(d) of the 1969 Tonnage Convention,

"The ship is remeasured according to article 3(2)(d) of the 1969 Tonnage Convention. The GROSS TONNAGE according to the measurement system previously in force to the measurement system of the International Convention on Tonnage Measurement of Ships, 1969 is: ... (*insert GRT tonnage*) ... RT, according to the regulations of ... (*insert country name*) ...."

.2 For ships covered by resolution A.494(XII) and/or resolution A.541(13),

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**Technical Head Office** 7111 Dekadine Ct. Spring, Tx., 77379 Tel: 1 (832) 451 0185, 1 (713) 204 6380

E-Mail: cbozenovici@vcmaritime.com

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"The ship is additionally measured according to resolution(s) ... (insert A.494(XII) and/or A.541(13), as applicable) ... The GROSS TONNAGE according to the measurement system previously in force to the measurement system of the International Convention on Tonnage Measurement of Ships, 1969 is: ... (insert GRT tonnage) ... RT, according to the regulations of ... (insert country name) ...."

### Remarks on other international certificates (1969)

For ships for which the International Tonnage Certificate (1969) includes a "Remarks" entry on national tonnage as described in paragraph 5 of this Recommendation, the appropriate box in the appropriate Ship Safety Certificate, the International Oil Pollution Prevention Certificate or other such official certificates issued by the Administration may show only that national gross tonnage with one of the following footnotes:

"The above gross tonnage has been determined by the tonnage authorities of the Administration in accordance with the national tonnage rules which were in force prior to the coming into force of the International Convention on Tonnage Measurement of Ships, 1969"; or

"See REMARKS column of the valid International Tonnage Certificate (1969)."

#### **Removal of remarks**

Should a ship lose eligibility for using national tonnage to apply relevant requirements under international conventions by undergoing alterations or modifications which the Administration deems to be a substantial variation in its existing tonnage as described in article 3(2)(b) of the 1969 Tonnage Convention, the Administration should ensure associated certificates as described in paragraphs 5 and 6 of this Recommendation are reissued or otherwise amended to delete reference to the ship's national tonnage.

#### **REFERENCES**:

- Resolution A.1073(28), Adopted on 4 December 2013, (Agenda item 10)

ATTACHMENTS: No.

Kindest Regards, Cosmin Bozenovici Naval Architect – Conarina Technical Head Office

Customer Service Center 5201 Blue Lagoon Drive, 9™. Floor, Miami, Fl., 33126 Tel: 1 (305) 716 4116, Fax: 1 (305) 716 4117, E-Mail:

joel@conarinagroup.com

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E-Mail: cbozenovici@vcmaritime.com