



**TECHNICAL CIRCULAR No. 607 of 05<sup>th</sup> February 2020**

To	All Surveyors/Auditors
Applicable to flag	All Flags
Title	<b>Electronic Record Books</b>
Reference	MARPOL Books

**International Convention for the Prevention of Pollution from Ships (MARPOL) Electronic Record Books (ERBs)**

A key element of the MARPOL regulations is recording discharges associated with the prevention of pollution from ships. Traditionally, the format of these record books has been provided in hard copy by the relevant Administration. However, as companies and shipowners increasingly focus on ways to operate in an environmentally responsible manner and aim to reduce the heavy burden associated with paperwork through electronic means, the concept of operational logs in an electronic format has become a popular consideration, but it is not without controversy. Marine Environment Protection Committee (MEPC) MEPC 74 (13-17 May 2019) adopted amendments to MARPOL, (IMO Resolutions MEPC.314(74) MEPC.316(74)MEPC.317(74)and ) and the NO<sub>x</sub> Technical Code 2008 (IMO Resolution ) to allow **ERBs to be used in lieu of hard copies**. The amendments are expected to enter into force **1 October 2020**.

Associated guidelines in IMO Resolution MEPC.312(74) on using ERBs were also adopted. They apply to:

- Oil Record Book, parts I and II (MARPOL Annex I, Regulations 17.1 and 36.1);
- Cargo Record Book (MARPOL Annex II, regulation 15.1);
- Garbage Record Book, parts I and II (MARPOL Annex V, Regulation 10.3);
- Ozone-depleting Substances Record Book (MARPOL Annex VI, Regulation 12.6);
- Recording of the tier and on/off status of marine diesel engines (MARPOL Annex VI, Regulation 13.5.3);
- Record of Fuel Oil Changeover (MARPOL Annex VI, Regulation 14.6); and
- Record Book of Engine Parameters (NO<sub>x</sub> Technical Code, paragraph 6.2.2.7).

The ERB guidelines aim to provide standardized information to ensure a consistent approach to approvals and ensure the MARPOL obligations are met.

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ERBs must be approved by the Administrator before being used. Over the past year, the Administrator has granted preliminary approvals to several ERB systems and will now be granting final approvals under IMO Resolution MEPC.312(74).

Importantly, until the amendments enter into force on 1 October 2020, ERBs may only be used in addition to hard copy record books. Before the entry into force, it is unclear whether port States will be accepting of ERBs. During the MEPC 74 deliberations, the US reiterated its view that ERB use should only be permitted after mandatory requirements are adopted and incorporated into the text of MARPOL. As a result, the US has reserved its position and are expected to pursue development of an ERB Code. The US position is driven by the US Justice Department's view that ERBs based on guidelines do not provide the same level of safety and security as hard copy.

The Administrator is committed to continued involvement at IMO on the ERB issue and will keep shipowners and operators apprised of any developments, including that of the US position.

REFERENCES:

- MARPOL Books
- (MEPC) MEPC 74 (13-17 May 2019)
- ATTACHMENTS: No

Kindest Regards,

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