



SUB-COMMITTEE ON BULK LIQUIDS  
AND GASES  
12th session  
Agenda item 6

BLG 12/6/22  
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## REVIEW OF MARPOL ANNEX VI AND THE NO<sub>x</sub> TECHNICAL CODE

### Simplified certification and relaxed technical file considerations – a proposal to amend the NO<sub>x</sub> Technical Code

Submitted by the United States

#### SUMMARY

**Executive summary:** This document provides suggested changes to the NO<sub>x</sub> Technical Code pertaining to simplified certification for C1 and C2 engines, reduced technical file requirements for all engines less than 30 liters per cylinder, and reduced technical file requirements for all engines installed on ships that are not subject to survey under regulation 6(1) of Annex VI

**Action to be taken:** Paragraph 4

**Related documents:** MEPC 53/5/4; BLG 10/14/12 and BLG 11/5

#### Introduction

1 The NO<sub>x</sub> Technical Code (NTC) should be amended to streamline the certification process for families of serially produced engines. Additionally, the NO<sub>x</sub> technical file documentation burden should be reduced for all engines that are less than 30 liters per cylinder installed on ships, and all engines installed on ships not subject to survey under regulation 6(1) of MARPOL Annex VI – vessels that are less than 400 GT with engines that are greater than 130 kW.

#### Simplified Engine Certification

2 2.2.6 of the NTC should be revised to allow certification of serially produced engines of an engine family based on a conformity of production check. This conformity of production check would not be limited to type approval and would be at the discretion of the Administration. This would streamline the certification process while ensuring that engines meet the certification requirements. The United States proposes to address this issue by amending the NTC as described in annex 1 to this document.

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3        2.3.6 of the NTC should also be revised to remove the requirement to carry the technical file on board for all engines with displacements of less than 30 liter per cylinder. Further, the NTC should be revised to state that ships with engines which have displacements at or greater than 30 liters per cylinder that do not meet the requirements of Regulation 6(1) of Annex VI, are not required to carry the technical file on board. The documentation burden for these ships should be reduced. In these cases where the technical file is not on-board, they should be made accessible on the internet. The engine manufacturer would then be responsible for keeping the technical file updated, the internet site must be accessible to the public, and the documentation must be secure and unalterable. The United States proposes to address this issue by amending the NTC as described in annex 2 to this document.

#### **Action requested of the Sub-Committee**

4        The Sub-Committee is invited to consider the information provided above, as well as the proposed NTC amendments provided in annexes 1 and 2 to this document, and take action as appropriate.

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## ANNEX 1

**PROPOSED AMENDMENT TO PARAGRAPH 2.2.6 OF THE NO<sub>x</sub> TECHNICAL CODE**

(proposed amendments in bold and strikeout)

~~2.2.6 For pre-certification of engines within an engine family or engine group, an EIAPP Certificate shall be issued in accordance with procedures established by the Administration to the parent engine(s) and to every member engine produced under this certification to accompany the engines throughout their life whilst installed on ships under the authority of that Administration.~~

**2.2.6.1 For pre-certification of engines within an engine group, an EIAPP Certificate shall be issued in accordance with procedures established by the Administration to the parent engine(s) and to every member engine produced under this certification to accompany the engines throughout their life, as specified in 2.3.6, whilst installed on ships under the authority of that Administration.**

**2.2.6.2 For pre-certification of an engine family, an EIAPP Certificate shall be issued in accordance with procedures established by the Administration to the parent engine(s). A copy of the parent engine EIAPP certificate shall act as the EIAPP certificate for all members of the engine family and it shall be issued by the engine manufacturer. It shall accompany the engines throughout their life, as specified in 2.3.6, whilst installed on ships under the authority of that Administration.**

**2.2.6.3 All engine family members shall be labeled with the engine family designation. These labels must be durable for the useful life of the engine and must be clearly legible at the time the engine is installed in the vessel and be indelible. If labels or plates are used, they must be attached in such a manner that the fixing is durable for the useful life of the engine, and the labels/plates cannot be removed without destroying or defacing them.**

**4.2.1 For member engines of an engine family, all documentation shall be issued by the engine manufacturer. For parent engines and engine group certification, all documentation for certification must be completed and suitably stamped by the duly authorized Authority as appropriate. This documentation shall also include all terms and conditions, including replacement of spare parts, to ensure that the engines maintain compliance with the required emission standards.**

~~4.3.10.2 A pre-certificate, or EIAPP Certificate, should be issued for a member engine of an entire family~~ **parent engine** in accordance with this Code which certifies that the parent engine meets the NO<sub>x</sub> levels specified in regulation 13 of Annex VI.

~~4.3.10.3 When the parent engine of an engine family is tested/ measured under the most adverse conditions specified within this Code and confirmed as complying with the maximum allowable emission limits (see 3.1), the results of the test and NO<sub>x</sub> measurement shall be recorded in the EIAPP Certificate issued for the particular parent engine and for all member engines of the engine family.~~

Appendix 2. Modify the flow diagram in Figure 1 according to the chapter revisions above.

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## ANNEX 2

**PROPOSED AMENDMENT TO PARAGRAPH 2.3.6 OF THE NO<sub>x</sub> TECHNICAL CODE**

(proposed amendments in bold)

2.3.6 Every marine diesel engine installed on-board a ship shall be provided with a technical file. **For ships that do not meet the requirements of Regulation 6(1) of Annex VI, but have marine diesel engines that meet the requirements of Regulation 13 of Annex VI, the Technical File (EIAPP Certificate) may be made available by the engine manufacturer on the internet instead of carried on board. For ships that meet the requirements of Regulation 6(1) and Regulation 13 of Annex VI which have marine diesel engine(s) with displacements at or greater than 30 liters per cylinder, the Technical File (EIAPP Certificate) for these engines must be carried on board. For ships that meet the requirements of Regulation 6(1) and Regulation 13 of Annex VI which have marine diesel engine(s) with displacements less than 30 liters per cylinder, the Technical File (EIAPP Certificate) for these engines may be made available by the engine manufacturer on the internet instead of carried on board.** The Technical File shall be prepared by the applicant for engine certification and approved by the Administration, and **where applicable from this paragraph**, is required to accompany an engine throughout its life on-board ships. **For applications where the technical file is available on the internet, the engine manufacturer is responsible for keeping the technical file updated, the internet site must be accessible to the public, and the documentation must be secure and unalterable.** The technical file shall contain information as specified in 2.4.1.

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