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FROM MCO HEAD OFFICE – TECHNICAL DEPARTMENT TO SURVEYORS/ MANAGEMENTS/ OWNERS/ OPERATORS SUBJECT RO Recommendations Concerning the Amendment Energy Efficiency Compliance After Alterations or Conversions and Amendments MARPOL ANNEX VI

Dear all,

By this means we would like to draw your attention to Recommendations Concerning the Amendment Energy Efficiency Compliance After Alterations or Conversions.

Meaning of "major conversion"

Under MARPOL Annex VI (Regulation 5.4), the Energy Efficiency Existing Ship Index (EEXI) and, if relevant, the Energy Efficiency Design Index (EEDI), must be recalculated and surveyed on board in the event of a major conversion, as defined in Regulation 2.2.17.

A major conversion includes:

- Any substantial change in hull dimensions or capacity, except a decrease of assigned freeboard if no other alterations to the ship structure are made.
- Any substantial increase in total engine power for propulsion (5% or more).
- A change of the MARPOL ship type as noted on the International Energy Efficiency Certificate (IEEC).
- A conversion intended to substantially prolong the life of the ship.
- Significant modifications that would require the ship to meet new requirements as if it were newly built.
- Any substantial alterations impacting energy efficiency, such as modifications that could cause the ship to exceed the applicable required EEXI or EEDI (if relevant).

EEDI compliance for extensive major conversions

If a major conversion is so extensive that the ship is considered newly constructed, the flag administration may require the ship to meet the EEDI requirements by using the reduction factor corresponding to the contract date of the conversion. In such cases, a ship originally subject only to the EEXI will also need to comply with the EEDI, and a ship already subject to the EEDI may face a more stringent EEDI requirement (a higher EEDI phase). However, most major conversions will not fall into this extensive category.

Approval of EEXI/EEDI Technical File

If the conversion is considered major, the EEXI and, if relevant, the EEDI should be recalculated, and the new Technical File(s) submitted for approval. Any necessary actions to meet the requirements should be included in the project, such as limiting the propulsion power. If installing a new or adjusting an existing overridable power limitation, an approved Onboard Management Manual (OMM) for Shaft Power Limitation (SHaPoLi) or Engine Power Limitation (EPL) will be required.

For ships subject to the EEDI, if the new attained EEDI is equal to or less than the new required EEXI, it can be considered the new attained EEXI. Consequently, the attained EEXI will be verified using the EEDI Technical File, eliminating the need for a separate EEXI Technical File.

Survey and certification after ship alteration

Upon completing the alteration, a survey shall be conducted to confirm the new EEXI and, if relevant, the EEDI. This survey will also verify any measures installed due to the new calculations, such as power limitations. Once the survey is completed, a new IEEC will be issued to reflect the updates.

The validity of the IEEC will be verified during annual statutory surveys. Additionally, the PSC guidelines include checks to determine if the ship has undergone a major conversion or if there have been changes affecting aspects covered by the EEXI or EEDI Technical Files.

EEXI/EEDI calculations for non-major conversions

Conversions that have an impact on energy efficiency, but which are not considered major conversions, will not require re-approval of the EEXI/EEDI Technical File(s) or a new IEEC. However, re-approving the Technical File(s) and issuing a new IEEC should be considered to reflect.

SEEMP/CII for ship alterations

When making alterations, it is important to consider their impact on the SEEMP III and the CII calculation as well. An alteration may affect the SEEMP III, which outlines the future attained and target CII as well as future measures in the three-year implementation plan. Key parameters used in the CII equation – such as MARPOL ship type, deadweight and gross tonnage – are particularly important. Therefore, the DCS verifier should be informed in order to make the necessary updates and correctly verify the CII to assign an appropriate rating.

Amendments to MARPOL Annex VI (Low-flashpoint fuels and other fuel oil related issues, marine diesel engine replacing steam system, accessibility of data and inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS)). Determines, in accordance with article 16(2)(f)(iii) of MARPOL, that the amendments shall be deemed to have been accepted on <u>1 February 2025</u> unless prior to that date not less than one third of the Parties or Parties the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant fleet have communicated to the Organization their objection to the amendments. Invites the Parties to note that, in accordance with article 16(2)(g)(ii) of MARPOL, the said amendments shall enter into force on <u>1 August 2025</u>.

Also invites the Parties to consider the early application of the amendments to appendix IX with regard to information to be submitted to the IMO Ship Fuel Oil Consumption Database from <u>1 January 2025;</u>

Recommendations

- When planning any alterations, it is essential to determine early on whether the changes will be considered a major conversion under MARPOL Annex VI. Assess the potential impact of the alterations and ensure that the ship remains compliant upon completion of the alteration.
- Must be compliance with the information to be submitted to the IMO Ship Fuel Oil Consumption Database from 1 January 2025.

Should you require any further assistance, please don't hesitate to contact us.

Best regards,

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