
Circular 2022/003

Use of Electronic Record Books for MARPOL related Record Keeping

Date: 26-07-2022

To whom it may concern,

The purpose of this circular is to confirm that the Belgian Maritime Inspectorate accepts the use of electronic record books on board of Belgian vessels for record keeping requirements related to the International Convention for the Prevention of Pollution from Ships (MARPOL Convention) and the NOx Technical Code 2008.

IMO resolutions MEPC.314(74), MEPC.316(74) and MEPC.317(74) adopted amendments to MARPOL Annexes I, II, V and VI and the Technical Code on Control of Emission of Nitrogen Oxides from Marine Diesel Engines (NOx Technical Code 2008), respectively, to enable the use of electronic record books. These resolutions entered into force on 1 October 2020.

An electronic record book could be a device, system or software application designed to facilitate accurate entries for discharges, transfers, and other operations into an efficient electronic format, while complying with International Conventions and Flag State requirements.

When electronic record books are used on board a Belgian vessel, the guidelines provided in Resolution MEPC.312(74) *'Guidelines for the use of electronic record books under MARPOL'* must be followed.

These Guidelines are only applicable to the use of electronic record books on board to meet the requirements of the following record books and recording requirements under the MARPOL Annexes and the Technical Code on Control of Emission of Nitrogen Oxides from Marine Diesel Engines (NOx Technical Code):

- .1 Record Book of Engine Parameters (NOx Technical Code, paragraph 6.2.2.7).
- .2 Oil Record Book, parts I and II (MARPOL Annex I, Reg. 17.1 and 36.1);
- .3 Cargo Record Book (MARPOL Annex II, Reg. 15.1);
- .4 Garbage Record Book, parts I and II (MARPOL Annex V, Reg. 10.3);
- .5 Ozone-depleting Substances Record Book (MARPOL Annex VI, regulation 12.6);
- .6 Recording of the tier and on/off status of marine diesel engines (MARPOL Annex VI, Reg. 13.5.3);
and
- .7 Record of Fuel Oil Changeover (MARPOL Annex VI, Reg. 14.6). It is to be noted that a record of fuel oil changeover is also to be made in the deck logbook as required by the Royal Decree of 15 July 2020 on environmentally sustainable shipping, as amended.

These Guidelines do not provide information on the management of electronic access to or electronic versions of certificates and other documents that do not log continuous operations of a ship.

The installation of the electronic record books on the bridge shall take into consideration guidelines on ergonomic criteria for bridge equipment and layout in MSC/Circ.982 – Guidelines on Ergonomic Criteria for Bridge Equipment and Layout and shall not give rise to electromagnetic interference which will affect the proper functioning of navigational systems and equipment on board.

For Voyage Data Recorders (VDR) installed on or after 1 July 2014, the information in the electronic record books shall also be recorded in the VDR. Reference is made to IMO Resolution MSC.333(90), more specifically under 5.5.20 Electronic logbook.

Where the approval of the above-mentioned electronic record books is to be carried out, it will consist of type approval of the software and a subsequent installation survey on board.

The type approval of the software for these electronic record books needs to be approved based on the IMO guidelines, including additional optional specifications for improved non-repudiation:

1. by another EU member State, and not by their Recognised Organisation, or
2. by a Belgian Recognised Organisation (RO). An RO can't approve its own software application.

The list of Belgian Recognised Organisations can be found in annex.

During the installation survey on board, the Belgian Recognised Organisation will assess the electronic record book against the prementioned guidelines. On successful verification as meeting these guidelines when installed on board, the Belgian Recognised Organisation issues a "*Declaration of MARPOL Electronic Record Book*" in accordance with the Appendix to MEPC.312(74). A copy of this declaration must be kept onboard the ship.

The declaration is ship-specific, noting the flag, ship's particulars, e-record book manufacturer, supplier, installer and software name/version.

The management of these electronic record books must be documented in and controlled through the Safety Management System (SMS), as described in section 11 of the International Safety Management Code (ISM Code). For vessels which are not subject to the requirements of the ISM Code, the same principles of a controlled document system have to be applied for the use of these electronic record books.

To comply with MARPOL requirements, an electronic record book should have the capability to retain all records made for the minimum period as specified in each Annex of MARPOL. The electronic record book should also have the capability to produce a hard copy of verified records for the master to certify as a true copy, upon request from relevant authorities, and to allow automatic backup of data in its system to offline storage.

It is essential to understand that the use of electronic record books or other electronic logbook systems does not lessen the shipowner's responsibility to accurately record, maintain, and produce records during an inspection. As such, it is recommended that all shipboard records and logs are maintained accurately and in a timely manner.

Despite electronic record book being introduced in MARPOL, there may still be Port States which are reluctant towards electronic record books. Therefore, before going fully digital the option of replacing the hardcopy record book should be carefully considered based on the vessels trading area and ports of call.

Annex: List of Belgian Recognised Organisations

The Belgian Recognised Organisations are:

- American Bureau of Shipping (ABS),
 - Bureau Veritas Marine & Offshore SAS (BV),
 - DNV AS,
 - Lloyd's Register Group Ltd (LR),
 - Nippon Kaiji Kyokai General Incorporated Foundation (Class NKK),
 - RINA Services S.p.A.
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