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## MARPOL Annex VI Record Book

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations, and surveyors

*This Notice supersedes BMA Information Bulletin No.126*

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### 1. Purpose

- 1.1. This Information Notice (IN) provides guidance on record keeping under Annex VI of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex VI).

### 2. Application

- 2.1. Applies to all ships subject to MARPOL Annex VI.

### 3. Introduction

- 3.1. MARPOL Annex VI requires that specific actions on board be recorded in relation to ozone depleting substances, greenhouse gas emissions, installed abatement technology and sulphur content in bunkered fuel oil, including the following:
- i. **Regulation 12.6** of MARPOL Annex VI requires ships which have rechargeable systems that contain ozone depleting substances to maintain an Ozone Depleting Substances (ODS) Record Book.
  - ii. **Regulation 12.7** requires that entries be made in respect of ozone depleting substances when specific actions are carried out, such as supply, charge & discharge of system, repair & maintenance.
  - iii. **Regulation 13.5.3** requires the tier and on/off status of marine diesel engines which are certified to both Tier II and Tier III, or to Tier II only, to be recorded in at entry and exit from a NOX Tier III emission control area (NECA), or when the on/off status of an engine changes within such an area.
  - iv. **Regulation 14.6** requires that the volume of low sulphur fuel oils in each tank as well as the date, time, and position of the ship when any fuel-oil-change-over operation is completed prior to the entry into an Emission Control Area (ECA) or commenced after exit from an ECA.
  - v. **Regulation 18.8.1** requires that the representative sample be retained under the ship's control until the fuel oil is substantially consumed, but in any case, for a period of not less than 12 months from the time of delivery.

- 3.1.2. Ships fitted with exhaust gas recirculation (EGR) are required to record discharge of bleed-off water, as per International Maritime Organization (IMO) Resolution [MEPC.307\(73\)](#)<sup>1</sup>.

#### **4. MARPOL Annex VI Record Book**

- 4.1. The Bahamas Maritime Authority (BMA) has issued a “Fuel Oil & Ozone Depleting Substances” Record Book since June 2010.
- 4.2. Following a consultation with users, version 2.0 of the MARPOL Annex VI Record Book has been redesigned to reflect record keeping requirements for exhaust gas cleaning (EGC) systems, NOx Emission Control Areas, EGR systems, etc., and renamed MARPOL Annex VI Record Book.
- 4.3. Previous versions of the BMA Record Book are no longer available but remain acceptable for use until 31 December 2021.
- 4.4. The revised Record Book is similar in design to other MARPOL Record Books, using a Code Letter and Item Number method for recording each operation, to eliminate unused pages and extend the time period covered by a single record book.
- 4.5. The BMA MARPOL Annex VI Record Book compliments the EGC Record Book required by section 2.3 of IMO Resolution [MEPC.259\(68\)](#)<sup>2</sup> for ships fitted with EGC systems but does not substitute it. Records pertaining to EGC system operations should be primarily produced in the EGC Record Book.

#### **5. Alternative methods of recording**

- 5.1. Where paper records are kept, the BMA MARPOL Annex VI Record Book should be used to demonstrate to interested third parties that the records are of the required standard and in a format acceptable to the BMA. Alternative paper record keeping systems which achieve a similar standard of recording to the BMA Record Book are also acceptable.
- 5.2. Electronic recording systems are acceptable, provided they comply with the requirements specified in [Marine Notice 10](#).

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<sup>1</sup>[https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.307\(73\).pdf](https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.307(73).pdf)

<sup>2</sup>[https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.259\(68\).pdf](https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.259(68).pdf)

## 6. General guidance for MARPOL Annex VI Record Book

### 6.1. *Availability, inspection, retention and copying*

- 6.1.1. MARPOL Annex VI Record Books are available for purchase from the BMA. Please contact [publications@bahamasmaritime.com](mailto:publications@bahamasmaritime.com).
- 6.1.2. For Electronic MARPOL Record Books, please refer to [Marine Notice 10](#).
- 6.1.3. Record Books should not be removed from any Bahamian ship except as detailed below for change of operating Company<sup>3</sup>.
- 6.1.4. The Record Book should be kept on board at all times and be readily available for inspection or copying.
- 6.1.5. Attention is drawn to IMO Circular MSC-MEPC.4/Circ.1, whereby only in exceptional circumstances, such as when a port or coastal State Authority can articulate a legal basis and reasons why it is necessary, and when the Master and all the parties concerned agree, should the original records/documents be removed and replaced by certified copies. In such circumstances a receipt should be left on board by the removing Authority stating the reason for the removal.
- 6.1.6. Completed MARPOL Annex VI Record Books should be retained on board for a period of not less than three years after the last record.
- 6.1.7. When there is a change in the Company operating the ship, MARPOL Annex VI Record Books may be removed from the ship to a place of safekeeping by the former Company and retained for a period of not less than three years from the date of last entry and remain available for inspection by a competent authority, if required.
- 6.1.8. In the case of the removal of the MARPOL Annex VI Record Book from the ship by a former Company, a certified copy of the last Record Book in use should be left on board for the benefit of the new operating Company, with entries covering a period of not less than six months prior to the change of operating Company. Such period may need to be extended to ensure the entries pertaining to all fuel<sup>4</sup> remaining on board to be handed over to the new operating Company. The copy may be in the form of loose printed pages, however such pages should be suitably bound to form an accurate representation of the completed parts of the book in its original format. Certifying of the copy may take the form of a declaration signed, and stamped by the ship's

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<sup>3</sup> The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Bahamas Merchant Shipping Act.

<sup>4</sup> Including all fuel bunkered in bulk for use in emergency systems and equipment

outgoing Master.

- 6.1.9. The new operating Company is responsible for maintaining and retaining the records related to MARPOL Annex VI from the date of taking over management of the ship.

6.2. ***Person carrying out the operation***

- 6.2.1. Operations requiring an entry to the MARPOL Annex VI Record Book should be carried out by a responsible officer.

- 6.2.2. Where operations are lengthy or complex in nature requiring involvement of various personnel on board, the person carrying out the operation shall be considered the officer in charge of the entire operation.

6.3. ***When to make the Record Book entry***

- 6.3.1. Record Book entries should be made directly on completion of the operation.

6.4. ***Person making the entry***

- 6.4.1. The person making the entry into the Record Book should be the officer who is directly responsible for carrying out that particular operation. Where an operation is being completed by other personnel the person making an entry shall be the officer under whose supervision the operation was being completed.

- 6.4.2. Operations extending beyond the duration of a single watch period should have a separate entry produced by each responsible officer for the part of the operation completed under their supervision.

6.5. ***Acceptable standard of entry***

- 6.5.1. Every effort must be made to ensure that the correct code letter, item number and narrative record are selected when making the Record Book entry. All three items are required to be entered before the entry can be considered complete.

- 6.5.2. Code Letter and Item Number - It is important that the appropriate code letters and numbers are assigned, in order to identify the type of operation.

- 6.5.3. Narrative Record - Care must be taken to ensure that the narrative record clearly identifies the exact operation which has been carried out. Supporting relevant information such as quantity, time, position etc. should be supplied as required.

- 6.5.4. The BMA considers that if the code letter and narrative record of operations clearly identify the operation which has been carried out, with relevant required information given, the intent of the Record Book entry requirements has been satisfied. The item number must be entered in good faith, although its susceptibility to third party interpretation is recognised.
- 6.6. ***Post-entry procedure***
- 6.6.1. Entries in the MARPOL Annex VI Record Book should be checked regularly by the Chief Engineer Officer, or Master, for accuracy and content but in any case, not less frequently than once a week. Any necessary amendments should be made promptly once an error has been discovered.
- 6.6.2. Amendments are acceptable if they are endorsed by both the Chief Engineer Officer, or Master, and the officer responsible for the original operation. Amendments shall take the form of crossing by a single thin line through the erroneous entry and include the date of amendment. A corrected entry is to be made on the first clear line available below and clearly reference the original entry.
- 6.6.3. For ships which utilise the services of a third party for overseeing pollution prevention operations, such as an Environmental Officer on board passenger ships, checking of the Record Book and endorsement of any necessary amendments may be made by that person in lieu of the Chief Engineer Officer or Master, provided that this responsibility is clearly defined within the ship's Safety Management System.
- 6.6.4. Each completed and checked page of the Record Book should be presented to the Master for endorsement without undue delay.
- 6.6.5. When the Master leaves the ship, the last partly completed page in the Record Book should be endorsed by the outgoing Master and a diagonal line drawn after the last entry across the remaining unused lines of the page.
- 6.6.6. Subsequent entries should start on a new page of the Record Book and be endorsed by the new Master as indicated above.
- 6.7. ***Errors found at a later date***
- 6.7.1. If, at a later date, Record Book entries are found to be in error or require to be clarified (such as during an audit or internal review) and the Officer who completed the original operation and/or the erratic entry is not on board anymore, a note of the relevant findings and any corrective actions should be attached to the inside cover of the relevant Record Book. No further action is necessary.

- 6.7.2. The presence of the findings should be accepted by third parties as proof of effective audit and review procedures and the affected entry should not be construed to be a current deficiency in the Record Book.

## **7. Guidance on completion of MARPOL Annex VI Record Book**

### **7.1. (A) Bunkering of Low Sulphur fuel oil**

- 7.1.1. This Code may be used to record bunkering of low sulphur fuel oil, sulphur content and Bunker Delivery Note details, but it should be noted that this is in addition to the Code (H) entries required in the Oil Record Book Part I.

### **7.2. (B) Tracking and control of MARPOL fuel oil samples.**

- 7.2.1. This Code is used for tracking and control of MARPOL fuel oil samples.
- 7.2.2. Records relating to the receipt and disposal of the same MARPOL sample (i.e., records B3/4.1 and B3/4.2) do not need to be placed on the same page or even in the same Record Book. Both records should be produced as and when the respective operation has been completed in the available space on the page currently in use.

### **7.3. (C) Transfer of custody of MARPOL sample**

- 7.3.1. This Code is used to record the transfer of custody of any MARPOL fuel oil sample to a third party, such as a Port State or other official.
- 7.3.2. The Master should obtain a receipt from the receiver of the sample and the address and contact details of the receiver should be recorded.

### **7.4. (D) Low sulphur fuel changeover record for Sulphur Emission Control Area (SECA).**

- 7.4.1. This Code is for recording the changeover to/from low sulphur fuel when entering/exiting a SECA.
- 7.4.2. Regulation VI/14.6 requires *“those ships using separate fuel oils to comply with [Regulation VI/14.4] and entering or leaving an Emission Control Area...The volume of low sulphur fuel oils in each tank as well as the date, time, and position of the ship when any fuel-oil-change-over operation is completed prior to the entry into an Emission Control Area or commenced after exit from such an area...”*.
- 7.4.3. Accordingly, when entering a SECA, the date, time and position of the ship and volume of low sulphur fuels in each tank are to be recorded on completion of the changeover (Codes D7.2 and D7.3). Codes D7.1 and D7.4 may be used to record the start of

changeover and time and position at entry to the SECA, should the Company wish to do so.

- 7.4.4. Similarly, when exiting a SECA, the date, time and position of the ship and volume of low sulphur fuels in each tank are to be recorded on commencement of the changeover (Codes D8.1 and D8.3). Codes D8.1 and D8.4 may be used to record the completion of changeover and time and position on exit from the SECA, should the Company wish to do so.

7.5. **(E) Exhaust gas cleaning system (EGCS) change of settings for Sulphur Emission Control Area (SECA) entry and exit**

- 7.5.1. This Code is used to record any change of settings on EGCS when entering or exiting a SECA.

7.6. **(F) Records of NO<sub>x</sub> Emission Control Area (NECA) entry and exit**

- 7.6.1. This Code is for recording the status of all engines installed on board to which Regulation VI/13.5.1 applies (i.e., NO<sub>x</sub> Tier III).
- 7.6.2. As per Regulation VI/13.5.3, *“the tier and on/off status of marine diesel engines...which are certified to both Tier II and Tier III or which are certified to Tier II only shall be recorded in such logbook or electronic record book, as prescribed by the Administration at entry into and exit from a NO<sub>x</sub> Tier III emission control area, or when the on/off status changes within such an area, together with the date, time and position of the ship”*.
- 7.6.3. Code F.11 should be used to record the date, time, and position at entry to a NECA and the status on/off of all applicable engines and their SCR/EGR equipment.
- 7.6.4. Code F12 should be used to record the date, time, and position at exit from a NECA and the status on/off of all applicable engines and their SCR/EGR equipment.
- 7.6.5. Code F13 should be used to record the date, time and position of engine start and stop of all applicable engines whilst in a NECA.
- 7.7. **(G) Records of EGR bleed off water operations**
- 7.7.1. MEPC.307(73) requires certain operations to be recorded in an EGR Record Book. This may be a separate record book, or these operations may be recorded in the MARPOL Annex VI Record Book.
- 7.7.2. Code G14 may be used to record a weekly inventory of the level(s) in the EGR bleed off water tank(s).

- 7.7.3. Code G15 may be used to record discharge of EGR bleed off water as follows:
- i. Code G15.1 may be used when bleed off water is discharged to shore reception facilities.
  - ii. Code G15.2 may be used when bleed off water when using fuel oil not complying with the sulphur limit in Regulation VI/14 (i.e., high sulphur fuel) is discharged overboard – see para 3.1 of MEPC.307(73).
  - iii. Code G15.3 may be used when bleed off water when using fuel oil complying with the sulphur limit in Regulation VI/14 (i.e., low sulphur fuel) is discharged overboard – see para 3.2 of MEPC.307(73).

7.8. **(H) Records of failure of installed SO<sub>x</sub>/NO<sub>x</sub> Emission Abatement systems**

- 7.8.1. This Code may be used to record failures of the installed SO<sub>x</sub>/NO<sub>x</sub> emission abatement systems.
- 7.8.2. A failure of the system is considered an exceedance of the system parameters that cannot be rectified within one (1) hour.

7.9. **(I) Ozone depleting substances (ODS)**

- 7.9.1. This Code is for recording ODS operations, including delivery and disposal, record of use and discharge or escape to atmosphere of ODS.
- 7.9.2. Ships without ODS are not required to use this Code.

7.10. **(J) Additional operational procedures and general remarks**

- 7.10.1. This Code may be used for operations or remarks that are not covered by other Codes.

**8. Queries**

- 8.1. Any queries relating to this Notice, or the use of the MARPOL Annex VI Record Book should be addressed to [tech@bahamasmaritime.com](mailto:tech@bahamasmaritime.com) or by contacting any BMA office.

