Gibraltar Maritime Administration
HM Government of Gibraltar

Watergate House
2/8 Casemates Square
Gibraltar

Tel; (+350) 200 46862/47771
Email; maritime.survey@gibraltar.gov.gi
maritime.registry@gibraltar.gov.gi

Shipping Guidance Notice – 100(b)

Electronic MARPOL & NOX Technical Code Record Books

Repeals SGN 100 & 100(a)

To: Ship Owners, Operators, Master's, Classification Societies and Recognised Organisations

References:

- Gibraltar Merchant Shipping (Prevention of Pollution from Ships) Regulations 2009 (as amended)
- MARPOL, Annex I, Annex II, Annex V, and, Annex VI
- NOx Technical code
- Resolution MEPC.312(74) - Guidelines for the use of electronic record books under MARPOL (as amended)
- Resolution MEPC.314(74) - Amendments to MARPOL Annexes I, II, and V
- Resolution MEPC.316(74) – Amendments to MARPOL Annex VI
- Resolution MEPC.317(74) – Amendments to the NOX Technical Code
- Red Ensign Group Unified Interpretation - REG-UI 002 Amendment 01
- eIDAS: Regulation (EU) on electronic identification and trust services for electronic transactions in the internal market adopted on 23 July 2013

1. Introduction

1.1. 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 as from 1 October 2020.

1.2. Following industry feed-back, the Gibraltar Maritime Administration together with the Red Ensign Group (REG) Administrations developed REG-UI 002 *(currently Amendment 01)* to advise of the REG policy regarding the acceptance of Electronic Record Books for British ships in respect of the regulations listed in IMO Resolution MEPC.312(74) outlined within section 2 of this Shipping Guidance Notice (SGN).

1.3. The guidance contained within MEPC.312(74) requires electronic signatures applied to an electronic record book to meet authentication standards, as adopted by the Administration.

1.4. REG-UI 002 Amendment 01 appended to this SGN sets out the REG's policy on:

- the approval of electronic record books;
- electronic signatures;
- storage of data; and,
- offline records.

2. Application

2.1. SGN 100(b) and REG-UI 002 Amendment 01 are applicable to Gibraltar registered ships intending to make use of MARPOL record books in an electronic format, for records pertaining to:

- MARPOL Annexes I - regulations 17.1 and 36.1 (as amended);
- MARPOL Annex II - regulation 15.1 (as amended);
- MARPOL Annex V - regulation 10.3 (as amended);
- MARPOL Annex VI - regulation 12.6 (as amended);
- MARPOL Annex VI - regulation 13.5.3 (as amended);
- MARPOL Annex VI - regulation 14.6 (as amended); and,
- NOx Technical Code - paragraph 6.2.2.7 (as amended).

Steve Gomez – Chief Surveyor
For & on behalf of the Maritime Administrator

Issue date: 05 February 2025

All notices are available through www.gibraltarship.com

This Shipping Guidance Notice has been issued electronically and does not carry a signature or official stamp. A signed and stamped copy i s available upon request.

UNIFIED INTERPRETATION

REG-UI 002 Amendment 01

MARPOL, Electronic Record Books

Notice to all Maritime Authorities, Recognised Organisations, Equipment Manufacturers, Ship Owners, Ship Operators, Ship Managers, Ships' Officers and Surveyors.

This Unified Interpretation should be read with Resolution MEPC.312(74) Guidelines for the Use of Electronic Record Books under MARPOL.

This REG -UI remains extant until recinded.

Summary

This Red Ensign Group -Unified Interpretation (REG-UI) has been published to advise of the REG decision regarding the acceptance of Electronic Record Books under MARPOL as listed in IMO Resolution MEPC.312(74).

1. Introduction

1.1 This REG-UI applies to operators of the Red Ensign Group (REG) registered ships who wish to use electronic MARPOL record books on their ships. The list of record books that this REG-UI applies to is stated at paragraph*. Applicable Record Books*.

1.2 The REG Administrations have published individual guidance to supplement this REG-UI, as listed in paragraph *5. Further Reading.*

2. Approval of electronic MARPOL record books

2.1 If a client wishes to use an electronic record book, they must ensure the following procedure has been followed:

2.1.1 The generic system must have been approved by a REG authorised Recognised Organisation (RO) or member of the REG (in most cases this will be by a RO); and

2.1.2 The RO classing the ship and issuing the MARPOL certificates must be contacted in order to arrange for the system to be accepted for use onboard the ship. The RO will verify the system has been installed correctly on the ship, including anything ship-specific such as back-up systems. If satisfied the system is acceptable, the ship's RO will issued a Declaration of electronic MARPOL Record Book to the ship. This Declaration must be retained onboard as evidence that the system has been accepted.

3. Electronic signatures, storage of data and offline records

3.1 MEPC.312(74) requires electronic signatures, storage data and offline records to be determined by the Administration. This Administration's policy on these areas is as follows:

3.1.1 Electronic Signatures:

3.1.1.1 MEPC.312(74) requires electronic signatures applied to an electronic record book to meet authentication standards, as adopted by the Administration.

3.1.1.2 There are many different standards for electronic signatures and a standard has to be chosen that ensures the signature is secure and tamper-proof.

3.1.1.3 This REG requirements are for electronic signatures to meet the requirements of Article 26 of the European eIDAS Regulations for advanced electronic signatures.

The advanced standard serves two main purposes. It makes it possible to verify if:

1. the signer of the document is known and trusted (authenticity); and
2. the document has been altered since being signed (to prevent tampering).

3.1.1.4 Notwithstanding 3.1.1.3 above, the REG is aware that not all available products in respect of MARPOL electronic record books operate on an "online" mode, and as such there may be limitations in terms of the incorporation of third party eDIAS advanced electronic signatures. For such products, the REG requires that provisions are incorporated whereby electronic signatures meet the general structure of eDIAS Article 26 whereby the electronic signature:

1. It is uniquely linked to the signatory;
2. It is capable of identifying the signatory;
3. It is created using electronic signature creation data that the signatory can, with a high level of confidence, use under their sole control;
4. The management of the signature and signatory ID is maintained by a suitable and clearly identified administrator (e.g. Vessel Master or onshore Manager); and,
5. It is linked to the data signed therewith in such a way that any subsequent change in the data is detectable and authorised.

3.1.1.5 Once a logbook entry has been made and signed using an electronic signature, it shall not be possible for another user to amend or delete the entry. In order to achieve this, an advanced electronic signature must meet the requirements of 3.1.1.4, points 1 to 5

3.1.1.6 For the purposes of this REG-UI, electronic signatures will have the same legal effect as described within eDIAS Article 25.

3.1.1.7 The company submitting their electronic MARPOL record book for approval, must be able to demonstrate to the RO carrying out the approval, that the above requirements have been met.

3.1.2 Storage of data and offline records:

3.1.2.1 MEPC.312(74) requires the electronic record book to have an appropriate method for backing up data and data recovery if the system were to fail or not be available from the ship's network. Paragraph 4.4.4 states:

"*This offline record may be provided in any format deemed appropriate by the Administration and should be digitally signed by the master."*

The REG's policy is that companies must determine their offline storage requirements and back up facilities which must ensure the information is stored for the minimum time period required by the relevant MARPOL Annex. This will be reviewed as part of the overall approval process which has been delegated to ROs. Any digital signatures used shall also be in compliance with the eIDAS advanced standard.

4. Applicable Record Books:

4.1 This REG-UI is applicable to the use of the following electronic 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):

4.1.1 **MARPOL ANNEXES**

1. Oil Record Book, parts I and II (MARPOL Annex I, regulations 17.1 and 36.1);
2. Cargo Record Book (MARPOL Annex II, regulation 15.1)
3. Garbage Record Book, parts I and II (MARPOL Annex V, regulation 10.3);
4. Ozone-depleting Substances Record Book (MARPOL Annex VI, regulation 12.6)
5. Recording of the tier and on/off status of marine diesel engines (MARPOL Annex VI, regulation 13.5.3);
6. Record of Fuel Oil Changeover (MARPOL Annex VI, regulation 14.6; and

4.1.1 NOx Technical Code

1. Record Book of Engine Parameters (NOx Technical Code, paragraph 6.2.2.7).

5. Further Reading

5.1 Recommended further reading in reference to Electronic Record books:

5.1.1 IMO:

5.1.1.1 Resolution MEPC.312(74): Guidelines for the use of electronic record books under MARPOL;

5.1.2 EU:

5.1.2.1 eIDAS: Regulation (EU) on electronic identification and trust services for electronic transactions in the internal market adopted on 23 July 2013; and

5.1.3 Individual REG Administration guidance:

5.1.3.1 UK: MIN 644(M+F) Approval and Acceptance of Electronic Record Books and Recording Requirements under MARPOL, refers https://www.gov.uk/government/collections/marine-information-notes-mins

5.1.3.2 Bermuda: Guidance Notice 2019-017 Electronic Log Books, refers https://bsma.bm/merchant-shipping-notices/

5.1.3.3 British Virgin Islands: Marine Circular No.4_Electronic Record Book https://bvimaritime.vg/MORE-INFORMATION/Notices/Marine-Circulars

5.1.3.4 Cayman Islands: CIGN 05/2019 Electronic MARPOL Record Books, refers https://www.cishipping.com/policy-advice/shipping-notices

5.1.3.5 Gibraltar: http://m.gibraltarship.com/ships

5.1.3.6 Isle of Man: TAN 008-20 Electronic MARPOL Record Books, refers https://www.iomshipregistry.com/notices-legislation/tans/

More Information

REG Secretariat, Maritime Governance, Improvement & Assurance
Maritime and Coastguard Agency
Bay 3/7
Spring Place
105 Commercial Road
Southampton
SO15 1EG

e-mail: REGsecretariat@mcga.gov.uk

Website Address: https://www.redensigngroup.org/publications/

General Enquiries: externalmonitoring@mcga.gov.uk

REG Member Ref: REG/INT/24/113

Published: January 2025 Please note that all addresses and telephone numbers are correct at time of publishing

Safer Lives, Safer Ships, Cleaner Seas