

## CIRCULAR NO. 72

### PORTUGUESE MARITIME ADMINISTRATION

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**SUBJECT** | Electronic Record Books under MARPOL

**To** | Shipowners/operators, Company, Ship Managers, Masters, Ships' Officers, Surveyors  
Recognized Organizations (ROs) and Port State Control Authorities

**DISCLAIMER** | This document is for information only and is not intended to interpret or replace  
the legal referenced documents published by official sources

**REFERENCES** | IMO Resolutions A.813(19), A.916(22), MSC/Circ.982, MEPC.312(74),  
MEPC.314(74), MEPC.316(74), MEPC.317(74) and ISO 21745:2019

#### 1. OBJECTIVE

The goal of this circular is to provide guidance on the use of Electronic Record Books (ERB) on board Portuguese flagged vessels under MARPOL as listed in Resolution MEPC.312(74).

#### 2. USE OF ERBS UNDER MARPOL

With the maritime industry getting more digital, as of October 2020, MARPOL enables the use of electronic record books (ERBs), in lieu of hard copy record books.

ERBs may be used on board to meet the following record book and recording requirements, under the MARPOL Annexes and the NOx Technical Code:

- Oil Record Book, parts I and II (MARPOL Annex I, regulations 17.1 and 36.1);
- Cargo Record Book (MARPOL Annex II, regulation 15.1);
- Garbage Record Book, parts I and II (MARPOL Annex V, regulation 10.3);
- Ozone-depleting Substances (ODS) Record Book (MARPOL Annex VI, regulation 12.6);
- Recording of the tier and on/off status of marine diesel engines (MARPOL Annex VI, regulation 13.5.3);
- Record of Fuel Oil Changeover (MARPOL Annex VI, regulation 14.6);
- Record Book of Engine Parameters (NOx Technical Code, paragraph 6.2.2.7).

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The Portuguese Administration allows the use of an ERBs is an alternative method to a hard copy record book. The ERBs may allow ships to utilise technology to reduce administrative burdens, increase efficiency and contribute to shipboard environmental initiatives, e.g. reduction of paper use.

Before replacing a hard copy record book, the electronic record book (ERB) will be subject to approval by the Flag State.

### **3. APPROVAL OF ELECTRONIC RECORD BOOKS (ERBs)**

The type approval process has been delegated to our Recognised Organisations (ROs) authorized to act on behalf of the Administration and listed at Circular no. 34, and may also include onboard installation. The RO will then issue to the ship a Declaration of MARPOL Electronic Record Book.

Manufacturers wishing to obtain approval for their systems from Portuguese Administration should contact one of the listed ROs directly, who can advise on the process required to obtain approval from the Administration.

ROs shall verify the compliance of the system with the provisions of IMO Resolution MEPC.312(74) and any additional requirement established by the RO. Upon completion of the assessment the RO is required to proceed with the issuance of the ship Declaration of MARPOL Electronic Record Book.

This declaration will serve as proof of meeting the requirements and it should be kept onboard for the purpose of regulatory surveys, or inspections.

### **4. INITIAL VERIFICATION ONBOARD**

Once the system has been duly approved by the RO, an initial verification onboard is to be performed by the RO in charge for the issuance of the relevant statutory certification.



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Scope of the verification is to confirm the correct installation of the system onboard and confirm that the operational requirements established by the IMO Resolution MEPC.312(74) are complied with.

Upon completion of the initial verification, the attending surveyor shall proceed with the issuance of the Declaration of Acceptance of Electronic Recording Systems (Declaration). The form of the Declaration will be the same as that found in the Appendix to Resolution MEPC.312 (74).

The Declaration shall have its validity aligned with survey window of the next IOPP periodical survey.

A Declaration may be issued by any Recognised Organisations (ROs) authorized to act on behalf of this Administration, regardless of the manufacturer or who the system has been approved by (providing the system has been approved as per the procedure defined by this Circular).

### 5. ANNUAL VERIFICATION

In conjunction with the relevant Statutory Periodical Surveys (Annual, Intermediate and Renewal), the RO attending surveyor is required to check that the ERB is fully operational and updated to the last version, additionally to the required verification of the records required by the applicable international convention and codes.

Upon completion of all relevant statutory periodical surveys the attending RO surveyor is required to renew the Declaration of Acceptance of Electronic Recording Systems, for the validity not exceeding the time window of the next periodical survey.

### 6. HARD COPIES AVAILABILITY ONBOARD

Shipowners are reminded that the use of electronic recording systems may not be accepted by all Administrations and as such should ensure hard copies of records are available if required by a port State. It is recommended that shipowners and crew of vessels are aware of the record keeping requirements within the ports into which they may enter.

Hard copies are required to have each page physically signed by the Master, indicating the date of signature and the following quote: “*True Copy*”



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The use of, and reliance upon, ERB's in no way relieves shipowners of their existing duty to accurately maintain and produce records during an inspection, as required by MARPOL.

### 7. MINIMUM RETENTION PERIODS FOR MARPOL RECORDS

Record Type	Minimum Retention Period	Reference
Oil Record Book Part I	3 years	MARPOL Annex I Reg.17.6
Oil Record Book Part II	3 years	MARPOL Annex I Reg.36.7
Noxious Liquid Substances Record Book	3 years	MARPOL Annex II Reg.15.5
Garbage Record Book Part I	2 years	MARPOL Annex V Reg.10.3.5
Garbage Record Book Part II	2 years	MARPOL Annex V Reg.10.3.5

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The General Director of Natural Resources, Safety and Maritime Services

#### More information

Directorate-General for Natural Resources, Safety and Maritime Services

Avenida Brasília 1449 - 030 Lisboa, Portugal

Tel.: +351 213 035 700

Website Address: <https://www.dgrm.mm.gov.pt/en/>

Email: [dsam.secretariado@dgrm.mm.gov.pt](mailto:dsam.secretariado@dgrm.mm.gov.pt)

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