



MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 4

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PREVENTION OF AIR POLLUTION FROM SHIPS

Comments on the outcome of BLG 12 on the proposal for an alternative procedure for certification of serially produced engines

Submitted by the European Association of Internal Combustion
Engine Manufacturers (EUROMOT)

SUMMARY

<i>Executive summary:</i>	EUROMOT proposes that an alternative and simplified certification procedure for serially produced engines should be included in the NO _x Technical Code and draft wording is provided for a new section 2.5
<i>Strategic direction:</i>	7.3
<i>High-level action:</i>	7.3.1
<i>Planned output:</i>	7.3.1.1
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	BLG 12/6/8, BLG 12/WP.6; MEPC 57/4/44 and MEPC 57/4/23

1 This document provides comments on MEPC 57/4/23 and is submitted in accordance with paragraph 4.10.5 of the Committees' Guidelines (MSC-MEPC.1/Circ.1) and the relaxed deadline for comments documents on the air pollution item to MEPC 57 with prior authorization of the MEPC Chairman following consultations with the Secretariat in line with paragraph 4.12 of the Committees' Guidelines.

Introduction

2 Referring to EUROMOT's submission BLG12/6/8 and the revised text given below, the proposal aims at serially produced engines and proposes to replace individual engine certificates (EIAPP) for members of an engine family by a family EIAPP certificate.

3 BLG 12 concluded that requiring individual engine certificates for members of a family of serially produced engines should be left to the discretion of the individual Administrations (cf. sections 7.2 and 7.3 of the working group report (BLG 12/WP.6)).

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4 The EUROMOT proposal allows for significantly reduced administrative burden for the certification of serially produced engines and is consistent with the successful processes for certifying engines for non-road mobile machinery as currently being implemented in corresponding regulations by the European Union and the United States.

The EUROMOT Proposal

5 EUROMOT is of the opinion that the application of an engine family certificate should not be limited to the discretion of individual Administrations, but be extended and further developed into an alternative certification procedure that can be applied by engine manufacturers to serially produced engines.

6 In particular, EUROMOT proposes to:

- .1 implement a family EIAPP certificate procedure for members of a family of serially produced engines with a power output of less than [8] MW; and
- .2 consider parameters defining an engine family as given by the European and United States regulations for non-road mobile machinery (e.g., EU Directive 97/68/EC and US EPA Regulation 40 CFR 1039.230).

7 EUROMOT proposes to amend the NOx Technical Code as follows:

- .1 insert a new section 2.5, as given in the annex to this document;
- .2 insert a new Appendix 2 (Form of a family EIAPP Certificate (see annex to MEPC 57/4/44));
- .3 revise other appendix numbers as required to allow for additional appendices;
- .4 amend 2.4.1 by additional 2.4.1.9 as follows:

“Where an engine family is subject to the “Alternative procedure for certification of an engine family” as described in 2.5 the information required in of 2.4.1 will be provided for all members of the engine family and the EIAPP certificate will be the family EIAPP certificate”;

- .5 modify 4.3.10.2 as follows:

“A pre-certificate, EIAPP Certificate or Family EIAPP certificate, should be issued for a member engine of an entire family in accordance with this Code which certifies that the parent engine meets the NOx levels specified in regulation 13 of Annex VI”; and

- .6 modify 4.3.10.3 as follows:

“When the parent engine of an engine family is tested/measured under the most adverse conditions specified within this Code and confirmed as complying with the maximum allowable emission limits (see 3.1), the results of the test and NOx measurement shall be recorded in the EIAPP Certificate or Family EIAPP certificate issued for the particular parent engine and for all member engines of the engine family”.

Action requested of the Committee

8 The Committee is invited to consider the alternative certification proposal and take action as appropriate.

ANNEX

PROPOSED NEW SECTION 2.5 TO THE NOX TECHNICAL CODE

2.5 Alternative procedure for certification of an engine family

2.5.1 The purpose of this procedure is to allow an engine family member built under an approved conformity of production scheme pre-certification to be covered by the pre-certification of the parent engine. It may be selected by the engine manufacturer.

2.5.2 Where this procedure is used the requirements of 2.2.6 are overridden.

2.5.3 An engine pre-certification shall be conducted in accordance with 2.2.1.2 for the parent engine.

2.5.4 An engine family EIAPP certificate shall be issued in accordance with the procedures established by the administration.

2.5.5 A copy of the engine family certificate shall be made available at point of delivery to the shipowner and shall be available throughout the life of the engine whilst installed on ships under the authority of that administration for the parent engine and every member engine produced.

2.5.6 All engine family members shall be labelled with the engine family and a reference to the list containing the components, settings and operating values which influence its NO_x emissions. These labels must be durable for the useful life of the engine and must be clearly legible and indelible. If labels or plates are used, they must be attached in such a manner that in addition the fixing is durable for the useful life of the engine, and the labels/plates cannot be removed without destroying or defacing them.

2.5.7 At the request of the administration, the manufacturer shall provide the administration with a list of the identification numbers of all the engines which have been manufactured in compliance with the criteria set down in this section since the last report or since the time when regulation first became applicable. It will do so within [[45] days of the end of each calendar year]] [after each date specified by the authority].

2.5.8 The Administration shall maintain an open register detailing the on going approval of the engine family together with any amendments to the engine family.

2.5.9 A form of the Family EIAPP certificate is attached as appendix 2 to this Code.