

URC23046 21March 2023

Notice to: Ship Owners/ Managers/ Operators / Surveyors/ Auditors

Many ships have applied EPL or SHaPoLi as an overridable power limitation to meet the EEXI requirements. Applying this solution may resolve in available power insufficiency and make the overriding power limitation a necessity, although this requires reporting and follow-up.

With this circular, URACOS aims to raise awareness on the steps required, in the case of using the power reserve when Engine Power Limitation (EPL) or Shaft Power Limitation (SHaPoLi) are applied to a vessel to reduce power. Refer to MEPC.335(76) – 2021 Guidelines on the shaft / engine power limitation system to comply with the EEXI requirements and use of a power reserve, for the full content of the Resolution as published by IMO.

Use of power reserve and OMM

Vessels that have applied either EPL or SHaPoLi to meet the EEXI requirements, in addition to the EEXI Technical File to cover the calculation requirement, must also have an Onboard Management Manual for EPL/SHaPoLi. OMM includes the technical description of the EPL / SHaPoLi installation, the methodology for releasing power reserves and reactivating the power limitation, the requirements on how to record and how to report, etc.

According to Regulation 3.1 of MARPOL Annex VI, the use of the power reserve by unlimiting the engine or shaft power limitation is only allowed when the need is to secure the ship's safety or to save life at sea. This action is subject to the judgement of the Master.

When the power reserve is used, records must be kept in the record page of the Onboard Management Plan of the EPL / SHaPoLi including:

- (a) Position and Time when used
- (b) The reason for using the power reserve
- (c) Position and Time of the reactivation of the power limitation.

The relevant information and records are to be, without delay, reported to the Flag State Administration (or the Recognized Organization) and the port of destination. The Flag State Administration is to report all cases of using power reserves to the IMO on an annual basis, mandatorily.

In the case that the EPL / SHaPoLi power limitation override is activated but the power reserve is not used, it is sufficient to just record the event in the bridge and engine room logbooks without the need of reporting the event to the Flag State Administration (or Recognized Organization). The engine room logbook should then record the power used during the period when the override was activated, together with details on the reactivation of power limitation.

Lastly, right after the risk has been mitigated (of the vessel's safety of the saving of the life at sea as per the Regulation of MARPOL mentioned before), power limitation shall be reactivated, and the ship operated within the limited power again as per the OMM. The reactivation shall then be confirmed with supporting evidence by the Flag State Administration (or Recognized Organization) based on the OMM procedure.

Summarized cases, as previously explained:

Power reserve after override	Used	Not used
Record in ER/bridge Logbooks		X
Record in MMO record page	X	
Notify Flag / RO	X	
Notify next Port	X	
Flag/RO confirm reactivation	X	Х

List of OMM record entries

The Onboard Management Plan record consists of the following items, in detail:

- 1. Ship Type
- 2. IMO Number
- 3. Ship size in DWT and/or GT, as applicable
- 4. Ship's limited shaft/engine power and ship's maximum unlimited shaft/engine power
- 5. Position of the ship and time stamp when power reserve was used.
- 6. Reason for using power reserve.
- 7. Beaufort number and wave height or ice condition in case of using power reserve under adverse weather conditions.
- 8. Supporting evidence (e.g., expected weather condition) in case of using power reserve for avoidance
- 9. Records from the SHaPoLi/EPL system for the electronically controlled engine during the use of power reserve
- 10. Position of the ship and time stamp when the power limit was reactivated or replaced.

Dromon Bureau of Shipping as a Recognized Organization

DBS, as a Recognized Organization issuing the International Energy Efficiency certificate, has adopted reporting and/or reactivation of the EPL / SHaPoLi Power Reserve through the scheduling of Occasional Survey at the earliest opportunity. The Survey shall be remote, and the report and all supporting evidence of reactivation can then be uploaded to myDromon, confirming reactivation and documenting it as per the OMM requirements.

Act now

Ship Owners/ Managers/ Operators should take into consideration all the above and ensure reporting of usage of power reserve in cases of emergency. They are also highly advised that in the case of failure of reporting, may result in findings during Port State Control Inspections. In addition, operators are reminded to log all the events relevant to the release of power reserve as required, even when the power reserve was not used.

