

SUB-COMMITTEE ON POLLUTION
PREVENTION AND RESPONSE
5th session
Agenda item 10

PPR 5/10/3
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**REVISED CERTIFICATION REQUIREMENTS FOR SCR SYSTEMS UNDER
THE NO_x TECHNICAL CODE**

**Certifying marine diesel engines with SCR-systems under the
NO_x Technical Code 2008**

Submitted by EUROMOT

SUMMARY

Executive summary: This document comments on document PPR 5/10/1(Sweden and SYBAss), considering the proposal of a new NO_x Scheme under regulation 4 of MARPOL Annex VI as equivalent method

Strategic direction: 1

High-level action:

Output: 1.24

Action to be taken: Paragraph 9

Related documents: PPR 5/10/1 and PPR 4/21

Introduction

1 This document is submitted in accordance with paragraph 6.12.5 of the *Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5) and comments on document PPR 5/10/1.

2 MEPC 71 adopted by resolution MEPC.291(71) the *2017 Guidelines addressing additional aspects of the NO_x Technical Code 2008 with regard to particular requirements related to marine diesel engines fitted with selective catalytic reduction (SCR) systems* (2017 SCR Guidelines) and established a work item at PPR 5 to assure that the mandatory instruments will reflect appropriately the discussion to make Scheme A and Scheme B testing and certification of engines with SCR-systems equivalently applicable.

3 Document PPR 5/10/1 (Sweden and SYBAss) provides a proposal for an alternative method to certifying engines with SCR-systems as equivalent method under regulation 4 of MARPOL Annex VI.

Discussion

4 Document PPR 5/10/1 proposes an alternative approach of NO_x emission verification of a ship instead of its particular engines fitted with SCR-systems under regulation 4 of MARPOL Annex VI to be considered as an equivalent method, and thereby circumventing all of the stipulated procedures of the NO_x Technical Code 2008 (NTC 2008) in conjunction with the 2017 SCR Guidelines. EUROMOT does not accept this way forward as appropriate, since regulation 4 means equivalents such as "... fitting, material, appliance or apparatus to be fitted in a ship or other procedures, alternative fuel oils, or compliance methods ... are at least as effective in terms of emissions reductions as that required by this Annex ...". The goal of emission reduction is assured by the engine in conjunction with the SCR-system. The equivalency of the proposed alternative approach is not laid out in document PPR 5/10/1.

5 NTC 2008 provides in its chapter 6 different procedures for demonstrating NO_x compliance. Besides the engine parameter check method, a direct measurement and monitoring method is provided in section 6.4. The approach in document PPR 5/10/1 deviates from both. It omits the existing single applicant approach with its inherent clear line of responsibility. It proposes a vague procedure based on a ppm measurement. EUROMOT is of the view that this proposal is based on misleading assumptions in the foregoing sections of the document and does not constitute an equivalent compliance method.

6 With reference to paragraphs 6 and 7 of document PPR 5/10/1, EUROMOT would like to state that certification to a certain NO_x limit of the engine and not of the ship is stipulated by NTC 2008. In addition, NTC 2008 is clear that an SCR-system is a component of the engine and as such must be included in the E(engine)IAPP Certificate. The view to split up the SCR-system from the engine is reiterated throughout the document. This would reopen the discussion on the single applicant approach, which has been endorsed by PPR 4 (PPR 4/21, paragraph 17.9.2). The procedural problems associated with the creation of a "share point" of responsibilities have been noted at PPR 4 already.

7 Engines that include a NO_x reducing device to achieve Tier III are not necessarily required to comply with a pre-certified Tier II limit without the SCR. Any demanded emission limit could imply the operation of the SCR-system since the engine raw NO_x emissions are not tuned to a certifiable limit. Only the interaction of the engine with the SCR would assure meeting Tier II or Tier III limits. This certainty should be respected and paragraphs 7 and 8 in document PPR 5/10/1 are critical in this regard.

8 NO_x emission requirements which demand the application of engines with NO_x reducing device should not result in circumventing the mandatory instruments. The 2017 SCR Guidelines have been developed with a view to open the term "applicant" to any stakeholder who takes responsibility for the emission performance of the engine including the SCR system.

Action requested of the Sub-Committee

9 The Sub-Committee is invited to consider the information provided and to take action as appropriate.