



Technical Circular

No.: 104/2017

Date: 11th August 2017

To whomsoever it may concern

Subject: Re-harmonization of IOPP Renewal Survey.

- De-harmonization of IOPP renewal survey was permitted by Republic of Marshall Islands flag vide marine circular 2-14-1 and technical circular no. 25 to have more time for fitment of Ballast Water Management Systems (BWMS).
- However, IMO Marine Environmental Protection Committee (MEPC) in its 71st session had approved draft amendments to regulation B-3 of the Ballast Water Management (BWM) Convention, setting out new deadlines for compliance with the D-2 discharge standard, i.e. the date by which ballast water treatment systems must be installed.
- The amendments delay the treatment system mandatory installation schedule after entry into force of the BWM convention. The installation date will be
 1. between year 2019 to 2022 for the vessels which had completed last IOPP renewal survey between 08/09/2014-07/09/2017 and
 2. between year 2022 to 2024 for the vessels to which IOPP renewal falls between 08/09/2017-07/09/2019
- Many ship-owners/ managers had pre-poned (de-harmonized) their IOPP certificate by carrying out IOPP renewal survey which was due after 08 September 2017, such vessels risk of losing up to two years on D-2 implementation date due to amended B-3 guidelines.
- Republic of Marshall Islands has issued guidance on re-harmonization of IOPP renewal survey and issuance of certificate for those vessels that have decoupled their IOPP renewal survey and now wish or intended to re-harmonize the same with other statutory renewal surveys.
- Administration has instructed that the re-harmonization should be accomplished prior to 08 September 2017 to avoid triggering of D-2 Compliance (fitment of BWM systems).
- Administration has given below procedure depending upon the point at which decoupling of IOPP renewal survey was carried out prior to 8 September 2017, for regularizing the re-harmonization.
 1. Decoupling survey completed within Harmonized survey window period
 - The original IOPP certificate will be reinstated.
 - Decoupling survey will be endorsed on the original IOPP certificate as an annual/ intermediate survey as applicable.



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- Decoupled IOPP certificate will be revoked.
2. Decoupling survey completed before Harmonized Survey window period and vessel is within Annual/Intermediate survey window period of original IOPP certificate
 - New certificate with new certificate number will be issued using the original dates and expiry date.
 - Annual/ Intermediate survey as applicable is to be carried out prior window closed.
 - Decoupling survey may be credited as occasional survey.
 - Certificate issued after decoupling survey is to be revoked.
 3. Decoupling survey completed before Harmonized Survey window period and vessel is not within Annual/Intermediate survey window of original IOPP certificate.
 - Original IOPP certificate can be reinstated.
 - Decoupled IOPP certificate is to be revoked and decoupling survey may be credited as an occasional survey
 - Overdue survey is to be carried out before 08 September 2017 with the scope of applicable overdue survey i.e. annual or Intermediate.
 4. Decoupling Survey completed after vessel's Annual/Intermediate Survey of original IOPP certificate
 - If decoupled survey completed after annual/intermediate survey and window for the next annual/intermediate survey under the original IOPP certificate has not passed, a new certificate may be issued using the original survey dates, expiry dates and new certificate number.
 - Decoupled IOPP certificate is to be revoked and decoupling survey may be credited as an occasional survey.
5. Scenarios other than above will be considered on a case by case basis.
- Ship Owners and managers are advised to take note of above.

Enclosure:

1. Republic of Marshall Islands Letter.

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