Red Ensign Group

Unified Interpretation

REG-UI 003
Amendment 01

REG Cruise Passenger Vessels fitted with Gas Turbines

Notice to all Recognised Organisations, Ship Owners, Ship Operators, Ship Managers, Ships' Officers and Surveyors.

This Unified Interpretation should be read in conjunction with Regulations 23 and 25 of MARPOL Annex VI as amended.

REG-UI 003 is now withdrawn. This REG-UI Amendment remains extant until rescinded.

Summary

This Red Ensign Group Unified Interpretation (REG-UI) has been published to advise of the REG decision regarding the exclusion of gas turbines from the EEXI calculations for REG Cruise Passenger Ships.

Amendment: Paragraph 3.3 has been amended from the original REG-UI 003 to provide examples.

1. Introduction

1.1 The new MARPOL Annex VI regulations (23 and 25) introduce the Energy Efficiency Existing Ship Index (EEXI) and require ships' emissions to be calculated using the installed power of the main engines. Gas turbines, which have a high installed power rating, cause ships which are fitted with a diesel engine / gas turbine combination to be very poorly rated under the new regulations. So much so that owners must consider removing the gas turbines from the ship to improve the EEXI rating.

2. Benefits of retaining Gas Turbines on Passenger Ships

2.1 The installation of the gas turbine plant as an additional source of power on board these ships improve the operational safety of these vessels by enabling a reserve increase in speed to be used when sick passengers and crew need to be transferred ashore urgently. Crucially they provide an additional power source located in a space away from the main diesel plant to be used in case of loss of these spaces in an emergency. On vessels with thousands of people on board these gas turbines could potentially save many lives in some emergency situations.

2.2 Compliance with the MARPOL Convention was never intended to make ships less safe. Indeed Regulation 3.1.1 of MARPOL Annex VI says that 'Regulations of this Annex shall not apply to: any emission necessary for the purpose of securing the safety of a ship or saving life at sea'.

3. Conditions

3.1 REG cruise passenger vessels fitted with gas turbine plant as part of a diesel engine / gas turbine installation will be allowed to exclude the gas turbines from the power-weighted average calculation of the specific fuel consumption used in the EEXI calculations for these ships.

3.2 This is conditional on the gas turbines only being used for emergency situations to secure the safety of the ship or saving life at sea.

3.3 When a Gas Turbine, which has been excluded from the ship's EEXI rating, is used in an emergency situation it will be considered a use of the power reserve. Examples of this include operating in, or the avoidance of, adverse weather and ice-infested waters, participation in search and rescue operations, when sick passengers or crew need to be transferred ashore urgently, avoidance of pirates and for engine maintenance. Details must be recorded in the Onboard Management Manual (OMM) as described in MEPC.335(76) section 3.2. Use of the power reserve must be reported to the Recognised Organisation (RO) and the port of destination. The flag administration will report all cases of the use of power reserve to the IMO on an annual basis.

3.4 If an operator wishes to continue to use gas turbines during the routine operation of the vessel, then the gas turbines must be taken into account when calculating the EEXI rating for the ship.

3.5 This applies to cruise passenger ships only.

More Information

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