



TECHNICAL CIRCULAR No. 915 of 7th March 2026

To	All Surveyors/Auditors. All flags
Title	Major conversion
Reference	MARPOL

MARPOL ANNEX VI, REGULATION 2.2.17

In relation to Chapter 4 regulations on carbon intensity, regulation 2.2.17 read as follows:

Major conversion means in relation to Chapter 4 of this Annex a conversion of a ship:

1. which substantially alters the dimensions, carrying capacity or engine power of the ship; or
2. which changes the type of the ship; or
3. the intent of which in the opinion of the Administration is substantially to prolong the life of the ship; or
4. which otherwise alters the ship that, if it were a new ship, it would become subject to relevant provisions of the present Convention not applicable to it as an existing ship; or
5. which substantially alters the energy efficiency of the ship and includes any modifications that could cause the ship to exceed the applicable required EEDI as set out in regulation 24 of this Annex or the applicable required EEXI as set out in regulation 25 of this Annex.

Interpretation:

2.1 For regulation 2.2.17.1, any substantial change in hull dimensions and/or capacity (e.g., change of length between perpendiculars (LPP) or change of assigned freeboard) should be considered a major conversion. Any substantial increase of total engine power for propulsion (e.g., 5% or more) should be considered a major conversion. In any case, it is the Administration's authority to evaluate and decide whether an alteration should be considered a major conversion, consistent with chapter 4.

Note: Notwithstanding paragraph 2.1, assuming no alteration to the ship structure, both decrease of assigned freeboard and temporary increase of assigned freeboard due to the limitation of Deadweight or draft at calling port should not be construed as a major conversion. However, an increase of assigned freeboard, except for a temporary increase, should be construed as a major conversion.

2.2 Notwithstanding paragraph 2.1, for regulation 2.2.17.5, the effect on Attained EEDI as a result of any change of ships' parameters, particularly any increase in total engine power for propulsion, should be investigated. In any case, it is the Administration's authority to evaluate and decide whether an alteration should be considered a major conversion, consistent with chapter 4.

CONARINA Head Office

6505 Blue Lagoon Dr. Suite 455

Miami, Fl., 33126

Tel: 1 (786) 558 5288,

Fax: 1 (786) 325 0200,

Joel@conarinagroup.com



2.3 A company may, at any time, voluntarily request re-certification of the EEDI, with IEE Certificate reissuance, on the basis of any new improvements to the ships' efficiency that are not considered to be major conversions.

2.4 In regulation 2.2.17.4, the terms "new ship" and "existing ship" should be understood as they are used in MARPOL Annex I, regulation 1.9.1.4, rather than as the defined terms in regulations 2.2.13 and 2.2.18.

2.5 The term "a ship" referred to in regulation 5.4.2 is interpreted as "new ship".

REFERENCE:

- MARPOL ANNEX VI

ATTACHMENTS: No.

Kindest Regards,
CONARINA Technical Office

CONARINA Head Office

6505 Blue Lagoon Dr. Suite 455

Miami, Fl., 33126

Tel: 1 (786) 558 5288,

Fax: 1 (786) 325 0200,

Joel@conarinagroup.com