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**Shipping Guidance Notice – 069**

**EU Monitoring, Reporting and Verification (MRV) regulations and IMO Data Collection Data Collection System (DCS)**

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To: Ship Owners, Operators, Master's, Classification Societies and Recognised Organisations

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**References:**

- EU Regulation 2015/757
- MARPOL Annex VI
- MEPC 70
- MEPC.278(70)

**1. Application:**

This is to remind shipowners/managers of the upcoming milestones in relation to the European Union MRV Regulations and the IMO DCS.

**2. EU MRV Regulations**

The MRV regulations are designed to progressively integrate maritime emissions into the EU's policy for reducing domestic greenhouse gas emissions (EU regulation 2015/757).

MRV Regulations require shipowners/managers to monitor, report and verify CO<sub>2</sub> emissions from their vessels calling at European Union ports.

The regulations relate to CO<sub>2</sub> emissions released on voyages which start or end in the port of an EU Member State, voyages between EU ports and periods at berth in EU ports. These regulations also apply to ports in the EEA countries, namely Iceland and Norway.

The regulations apply to ships above 5,000 GT regardless of Flag State.

**A. EU MRV Timeline:**

A summary of the relevant EU regulations timeline is as follows:

- Up until January 2018 – Companies are to submit ship-specific monitoring plans to verifiers for approval. Monitoring plan should be approved.

- As from 1 January 2018 Monitoring plan assessment should be completed. Per-voyage monitoring of data commences;
- As from 30 April 2019, every 30 April each year, verified annual emission reports submitted to the EU by the flagstate Administration;
- As from June 2019 onwards vessels will be required to carry a valid Document of Compliance (DOC) (issued under these regulations).
- 30 June each year – ship emissions reports are required to be made publicly available by the EU.
- The data collection cycle will then be repeated for subsequent years.

B. Monitoring plans:

As from 31 August 2017, Companies should have prepared a monitoring plan for each applicable vessel.

The monitoring plans are subject to verification and must be submitted to an independent and accredited verifier.

A verified monitoring plan must be in place before the requirements on monitoring and recording enter into force on January 2018.

Shipowners/operators which have not had their plans verified should make arrangement to have their plans are verified. Their respective Classification Societies should be contacted.

The monitoring plan provides a description of how monitoring and reporting will be managed. Monitoring plans should be developed in line with EU Regulation 2015/757 as amended.

The Regulation states that the monitoring plans should detail the method of monitoring and contain the following as a minimum:

1. Information on the vessel and the shipowner or operator, complete with appropriate contact details;
2. A description of the CO<sub>2</sub> emission sources on board: main engines, auxiliary engines, gas turbines, boilers and inert gas generators and what the fuel types are used in each;
3. A description of the procedures, systems and responsibilities to ensure the list of CO<sub>2</sub> emission sources is kept up to date and any changes over the reporting period are accounted for;
4. A description of the procedures to monitor and ensure the list of voyages is complete;
5. A description of the procedures for monitoring the fuel consumption of the ship, including:
  - a. the method chosen for calculating the fuel consumption of each CO<sub>2</sub> emission source;
  - b. the procedures for measuring fuel bunkered and fuel remaining on board;
  - c. the method chosen for determining density of fuels, where applicable;
  - d. a procedure to ensure that the uncertainties in fuel measurements are consistent with the Regulation;
  - e. The emission factors used for each fuel type, or in the case of alternative fuels, the methods used to determine the emission factor;
6. A description of the procedures used for determining activity data per voyage, including:
  - a. the procedures, responsibilities and data sources for determining and recording the distance;
  - b. the procedures, responsibilities, formulae and data sources for determining and recording the cargo carried and/or the number of passengers, as applicable;
  - c. the procedures, responsibilities, formulae and data sources for determining and recording the time spent at sea between the port of departure and the port of arrival;
7. A description of how any data gaps will be managed (e.g. in the event of a failure of a flowmeter) and the use of secondary data to fill in these gaps;
8. A revision record sheet to record all changes and modifications to the plan.

The basis for the calculation of CO<sub>2</sub> emissions will be the fuel consumption for voyages starting or terminating at any EU port. Ship specific monitoring plan should document the choice of monitoring method and provide further information on the application of the method chosen.

These rules take into account existing requirements and data already available on board ships. Therefore companies would be given the opportunity to choose one of the following four monitoring methods to determine and calculate fuel consumption:

1. Bunker Delivery Note (BDN) and periodic stock takes of fuel tanks;
2. Bunker fuel tank monitoring on board;
3. Flow meters for applicable combustion processes;
4. Direct CO<sub>2</sub> emission measurements.

The EU has provided a template for the monitoring plan which can be found:

<https://publications.europa.eu/en/publication-detail/-/publication/6760acec-a2e8-11e6-8401-01aa75ed71a1/language-en/format-PDFA1A>

Further guidance is available from the European Sustainable Shipping Forum (ESSF) Website and the respective Classification Society websites.

#### C. Requirement to monitoring and record CO<sub>2</sub> Emissions:

CO<sub>2</sub> Emission monitoring and recording in accordance with a verified plan commences on 1 January 2018. The records will be on both a per-voyage basis and annual basis.

Vessels which are exclusively engaged on domestic trade within an EU/EEA member state or perform more than 300 applicable voyages during the reporting period are exempt from reporting on a per-voyage basis and only need to report on an annual basis.

The ESSF have published guidelines on monitoring and reporting.

The reporting period reoccurs annually, from 1 January to 31 December each year. At the end of each reporting period, the shipowner or operator must prepare an emissions report. This report is submitted by the end of each April. Therefore the first emissions report must be submitted by 30 April 2019.

### **3. IMO Monitoring Programme:**

In January 2013 Chapter 4 was incorporated into MARPOL Annex VI. Regulation 22 requires that a Ship Energy Efficiency Management Plan (SEEMP) is kept onboard. On October 2016, MEPC.70 adopted a data collection system which will commence in January 2019. This will be known as the IMO DCS (Data Collection System for fuel oil consumption). This requires that the SEEMP has to be developed into two parts as follows:

**Part I** – The ship management plan providing an approach for monitoring ship and fleet energy efficiency performance. This would be applicable to ships of 400 GT and above engaged on international voyages;

**Part II** – Methodologies utilized to gather fuel consumption data. This would be apply to ships of 5,000 GT and above engaged on international voyages.

As referred to above the IMO DMCS would apply to ships of 5,000 GT and above with the exception of ships engaged on domestic voyages, ships not propelled by mechanical means and platforms (including FPSOs, FSUs and Drilling Rigs).

In circumstances where a ship is normally engaged on domestic voyages but which, in exceptional circumstances, is required to undertake a single voyage, an exemption for any of the requirements in Chapter 4 of MARPOL Annex VI may be requested from the Administration. Further information and guidance can be found on MEPC.1/Circ.863.

Based on the use of the several allowable collection methods, the IMO DCS will require the collection of data on the total annual fuel oil consumption. With the exception of berthing and transiting at sea, the aforementioned data will consist of fuel consumption due to activities including but not limited to:

1. Anchoring;
2. Drifting;
3. Bunkering/debunkering;
4. Supply stops;
5. Maintenance;
6. Cargo loading/offloading;
7. Ballast;
8. Any other commercial activities.

### **IMO DCMS Timeline**

A summary of the relevant IMO DCMs regulations timeline is as follows:

- 01 March 2018 – Entry into force;
- Before 31 December 2018 – New SEEMP Part II (data collection plan) included in the SEEMP and flag/RO will ensure that Part II complies with the relevant regulations;
- 01 January 2019 to 31 December 2019 – Commence annual monitoring for calendar year;
- As from 2020 – Ships will be required to submit data within 3 months after the calendar year to the flag state Administration or any organisation authorised by it (31 March at the latest);
- A Statement of Compliance (SOC) is to be issued within 2 months of receiving the data by the flag state Administration or any organisation authorised by it (by 31 March at the latest);
- The data collected will then be submitted to the IMO by the flagstate Administration (or any organisation authorised by it) within 1 month of the issuance of a Statement of Compliance (SOC).

#### 4. The EU MRV Regulations and the IMO DCS

	EU MRV (for CO <sub>2</sub> emissions)	IMO DCS (for Fuel Oil Consumption)
Entry into force	01 July 2015	01 March 2018
First Monitoring period	2018	2019
Applies to	Ships of 5,000 GT and above engaged on commercial voyages into, out of and between EU ports	Ships of 5,000 GT and above on international voyages
Monitoring plan	Yes – standard format	To be included in SEEMP
To be included in the reported data	<ul style="list-style-type: none"> <li>- Fuel oil Consumption</li> <li>- Direct CO<sub>2</sub> emissions measurements acceptable</li> <li>- Cargo monitoring</li> <li>- Distance travelled</li> <li>- Time at sea and in port</li> <li>- Transport work based on actual cargo</li> <li>- CO<sub>2</sub> emissions calculated</li> <li>- Port of departure/arrival</li> <li>- Separate data to be collected for voyages and berthing</li> </ul>	<ul style="list-style-type: none"> <li>- Fuel oil consumption</li> <li>- Direct CO<sub>2</sub> emissions measurement not required</li> <li>- Design dwt used as cargo proxy</li> <li>- Distance travelled</li> <li>- Hours underway</li> </ul>
Reports to	EC	Flagstate Administration (or authorised organisation)
Verification	3 <sup>rd</sup> Party independent accredited verifier	Flagstate Administration (or authorised organisation)
Disclosure	Public	Confidential
Data reporting format	Standard format for annual emissions report provided as set out in implementing act	Standard format (as per MEPC.282 (70)) as amended
Reporting platform	THETIS MRV	No global reporting platform for shipowners
Voluntary reporting	Yes. Several data fields are voluntary	No

Table 1: Comparison between EU MRV regulations and IMO DCS

Both the EU MRV and IMO DCS schemes are expected to run in parallel.

Richard Montado  
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