



PACIFIC MARINE SERVICES

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Technical Publications

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Frequently Asked Questions / IMO Data Collection System (Explanatory guidance)

Notice to :

Ship Owners / Manager / operators / Representatives of Togo flagged vessels / Recognized-authorized ROs surveyors / Flag State Administrations.

Dear Sirs,

P.M.S Class has prepared a new Technical Publication for the new IMO Data Collection System. The publication includes frequently ask questions with regards to the amendments of MARPOL Annex VI, the development of SEEMP Part II as well as other important information for the obligations of ship owners (for e.g. what happens if the ship changes managers etc.).

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For further information, please refer to PMS on Website of (www.pmsclass.org) - <https://pmsclass.org/rules/pms-technical-publications/>

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Ajman Free Zone F.Z.E – P.O.BOX 8474 Ajman – Tel Fax 0097165560121-Mobil No 00971504500338 – Mail (pacific.m.s@eim.ae)
(pacific.m.s@eim.ae) بريد الكتروني – 00971504500338 رقم موبايل – 0097165560121 فاكس (8474) – ص.ب (8474) عجمان المنطقة الحرة –



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1- What “DCS” stands for?

“DCS” stands for “Data Collection System”.

2- Why IMO has developed this data collection system?

The IMO data collection system for fuel oil consumption of ships is the first in a three-step process that also includes data analysis and determination whether further measures are needed to enhance energy efficiency and address greenhouse gas emissions from international shipping. Further information can be found here

<http://www.imo.org/en/mediacentre/pressbriefings/pages/11-data-collection-.aspx>.

IMO’s Data Collection System (DCS) will follow three step approach

Data Collection	Data Analysis	Decision Making on further measures
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3- What the regulation requires?

The IMO Marine Environmental Protection Committee (MEPC) at its 70th session adopted amendments to MARPOL Annex VI establishing a mandatory IMO scheme for the collection and reporting of fuel oil consumption data for each type of fuel used onboard a ship (Resolution MEPC.278(70)).

As required by the new Regulation 22A of MARPOL Annex VI :

- From calendar year 2019 (i.e. 01/01/2019 to 31/12/2019), each ship of 5,000 gross tonnage and above shall collect the data in a predefined form, for that and each subsequent calendar year or portion thereof, as appropriate, according to the methodology included in a new SEEMP Part II.
- At the end of each calendar year, the ship shall aggregate the data collected in that calendar year or portion thereof, as appropriate.
- Within three months after the end of each calendar year, the ship shall report to its Administration or any organization duly authorized by it, the aggregated value for each datum, via electronic communication and using a standardized format.
- Upon verification of the submitted data, the Administration or any organization duly authorized by it will issue to the ship by 31st of May a Statement of Compliance related to fuel oil consumption.
- Finally, the Administration will submit aggregated data to the IMO, which will maintain an anonymized IMO Ship Fuel Oil Consumption Database.

4- Which regulations have been adopted by IMO for the DCS?

The IMO Marine Environmental Protection Committee (MEPC) has adopted the following resolutions:

- **MEPC.278(70)** : a resolution on the amendments to MARPOL Annex VI.
- **MEPC.282(70)** : a resolution on 2016 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP), which supersedes the 2012 Guidelines (MEPC.213(63)).
- **MEPC.292(71)** : a resolution on 2017 Guidelines for administration verification of ship fuel oil consumption data.

5- To which ships it applies?

The new Regulation 22A of MARPOL Annex VI applies to all ships of 5,000 GT and above engaged on international voyages.

The regulation does not apply to :

- 1- Ships engaged on domestic voyages;
- 2- Ships not propelled by mechanical means; and.
- 3- Platforms, including FPSOs, FSUs and drilling rigs.



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6- To which voyages it applies?

To all international voyages. In case your ship is typically engaged on domestic voyages and exceptionally requires to undertake a single international voyage, an exemption from the Administration shall be issued (refer to the IMO [MEPC.1/Circ.863](#) for guidance).

7- Is there any exemption on a per-voyage monitoring?

There is an exemption when a ship diverts from its scheduled passage to engage in search and rescue operations.

8- What does a calendar year means?

Calendar year means the period from 1 January until 31 December inclusive.

9- What is the role of the Administration of the ship?

The aggregated data will be reported to the Administration after the end of each calendar year and the Administration or any organization duly authorized by it, having determined that the data has been reported in accordance with the requirements, will issue a Statement of Compliance to the ship.

In addition, the Administration is responsible to transfer within one month after issuing the Statement of Compliance of the ship to the IMO Ship Fuel Oil Consumption Database the reported data (refer to **Question #13** on what information will be reported to the IMO). This reporting will be done in electronic format and will be confidential (the ship will not be identified).

10- What happens if the ship changes company?

Where there is a change of company (for e.g. the vessel is sold etc.), the ship shall on the day of completion of the change or as close as practical thereto report to its Administration or any organization duly authorized by it, the aggregated data for the portion of the calendar year corresponding to the Company, as specified in **Appendix IX** to **MARPOL Annex VI** and, upon request of its Administration, the disaggregated data.

11- What happens if the ship changes Administration?

In the event of the transfer of a ship from one Administration to another, the ship shall on the day of completion of the transfer or as close as practical thereto report to the losing Administration or any organization duly authorized by it, the aggregated data for the period of the calendar year corresponding to that Administration, as specified in **Appendix IX** to **MARPOL Annex VI** and, upon prior request of that Administration, the disaggregated data.

12- What does standardized data reporting format means?

Regulation 22A.3 of **MARPOL Annex VI** states that the data specified in **Appendix IX** to **MARPOL Annex VI** are to be communicated electronically using a standardized form developed by the Organization. The collected data should be reported to the Administration in the standardized format shown in **Appendix 3** of the IMO Resolution **MEPC.278(70)**.

13- What shall be submitted to the IMO Ship Fuel Oil Consumption Database?

The following information should be submitted to the IMO Ship Fuel Oil Consumption Database :

- 1- Identity of the ship - IMO number;
- 2- Period of calendar year for which the data is submitted:
 - A - Start date (dd/mm/yyyy)
 - B - End date (dd/mm/yyyy)
- 3- Technical characteristics of the ship:
 - a) Ship type, as defined in regulation 2 of this Annex or other (to be stated)
 - b) Gross tonnage (GT)
 - c) Net tonnage (NT)
 - d) Deadweight tonnage (DWT)
 - e) Power output (rated power) of main and auxiliary reciprocating internal combustion engines over 130 kW (to be stated in kW)
 - f) EEDI (if applicable)
 - g) class ID



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- 4- Fuel oil consumption, by fuel oil type in metric tonnes and methods used for collecting fuel oil consumption data.
- 5- Distance travelled:
 - a) Hours underway

14- Which ship engines and other fuel oil consumers should be included in SEEMP Part II?

Fuel oil consumption should include all the fuel oil consumed on board including but not limited to the fuel oil consumed by the main engines, auxiliary engines, gas turbines, boilers and inert gas generator, for each type of fuel oil consumed, regardless of whether a ship is underway or not.

15- What are the methods for collecting data on annual fuel oil consumption?

There are three methods for collecting data on annual fuel oil consumption as outlined herewith below:

Method 1: using bunker delivery

Method 2: using flow meters

Method 3: using bunker fuel oil tank monitoring on board

Direct CO₂ emission measurement is not required by regulation 22A of MARPOL Annex VI however, it can be used for collecting data of annual fuel oil consumption. As required by MEPC.282(70) in case of the absence or/and breakdown of direct CO₂ emissions measurement equipment, manual tank readings will be conducted instead. The locations of all equipment applied are described in this monitoring plan. Also, calibration of the CO₂ emissions measurement equipment should be specified. Calibration and maintenance records should be available on board.

16- What shall be included in SEEMP Part II??

You must prepare SEEMP Part II that shall include the following information :

- Ship Particulars (Name of ship; IMO Number, Company; Flag etc.).
- Record of revision.
- Ship engines and other fuel oil consumers and fuel oil types used.
- Emission factors.
- Method to measure fuel oil consumption.
- Methods to measure distance travelled.
- Method to measure hours underway.
- Process that will be used to report the data to the Administration.
- Procedures for data quality.

17- How do I specify distance travelled?

Appendix IX of MARPOL Annex VI specifies that distance travelled should be submitted to the Administration and :

- 1- distance travelled over ground in nautical miles should be recorded in the log-book in accordance with SOLAS regulation V/28.13;
- 2- the distance travelled while the ship is underway under its own propulsion should be included into the aggregated data of distance travelled for the calendar year; and
- 3- other methods to measure distance travelled accepted by the Administration may be applied. In any case, the method applied should be described in detail in the Data Collection Plan (i.e. SEEMP Part II).

18- What does hours underway means?

Appendix IX of MARPOL Annex VI specifies that hours underway should be submitted to the Administration. Hours underway should be an aggregated duration while the ship is underway under its own propulsion.

19- What does data quality means?

The Data Collection Plan (SEEMP Part II) should include data quality control measures which should be incorporated into the existing shipboard safety management system. Additional measures to be considered could include :

- The procedure for identification of data gaps and correction thereof; and
- The procedure to address data gaps if monitoring data is missing, for example, flow meter malfunctions.



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20- Who issues the Statement of Compliance?

The Administration or any organization duly authorized by it. into

21- What is the validity period for the Statement of Compliance?

The Statement of Compliance shall be valid for the calendar year in which it is issued and for the first five months of the following calendar year. All Statement of Compliance shall be kept on board for at least the period of their validity.

Differences between IMO DCS and EU MRV :-

The EU MRV (monitoring, reporting and verification) process started in 2017, with ship-owners having to submit their monitoring plan to a verifier for assessment by the end of August 2017.

MRV stands for monitoring, reporting and verification of fuel consumption, CO2 emissions, and transport work of ships. In particular, it is a system to collect and publish for comparison and statistical purposes data on CO2 emissions and efficiency of ships.

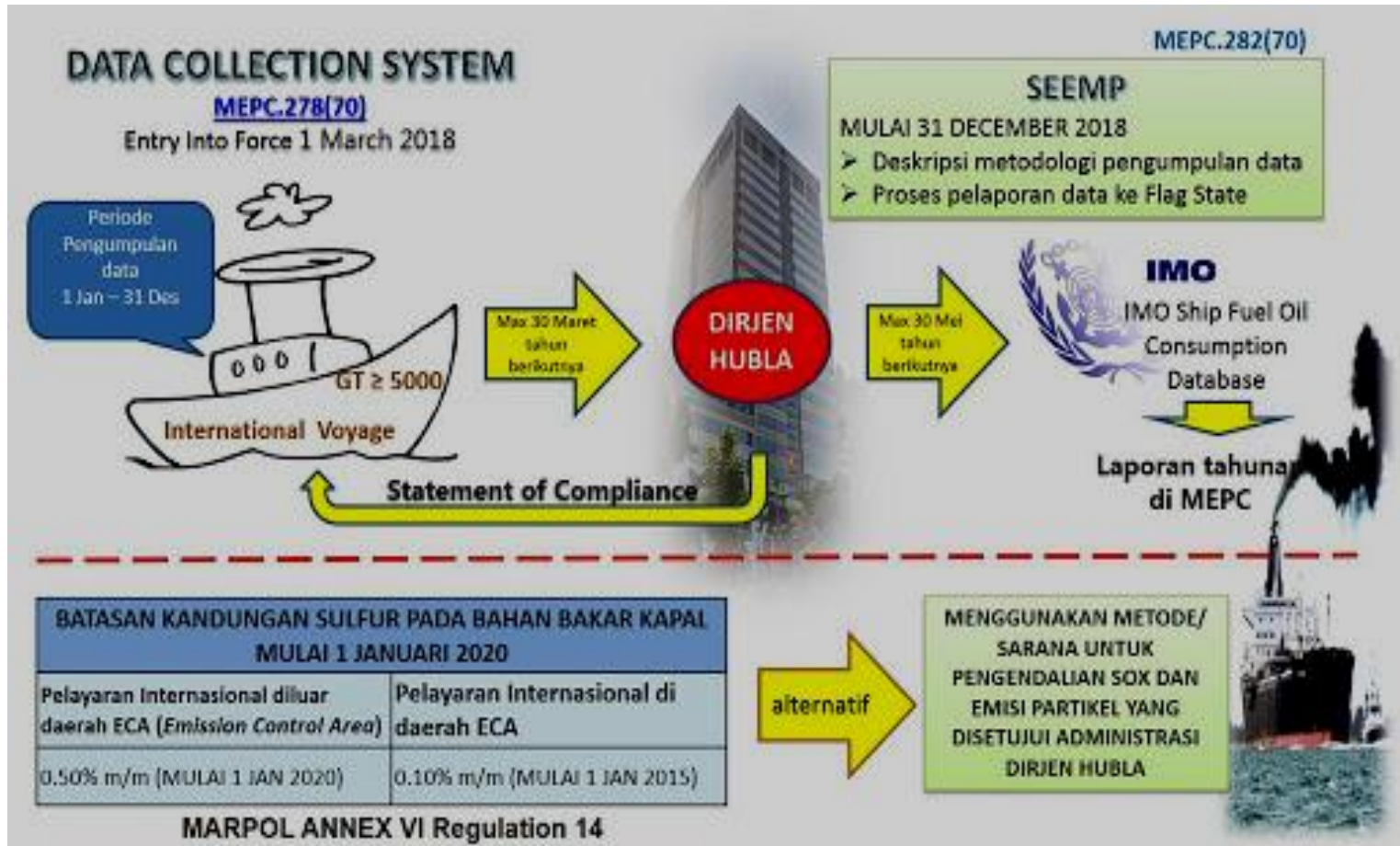
It applies to ships exceeding 5000 gross tonnage (GT) regardless of Flag or country of ownership, calling at an EU port from 1 January of 2018 and carrying cargo or passengers for commercial purposes.

The accountable entity in the EU MRV is the ship itself. Namely, these ships must :

- Develop their own monitoring plan (MP) and have it assessed by an independent verifier;
- Monitor and report their emissions and activity data, starting on the first of January 2018;
- Have their emissions report independently verified before submission to the Commission and Flag state;
- Carry on-board a Document of Compliance (DOC) from June 2019, which highlights the vessels license to trade and operate.



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Recommendation to Owners / Managers / Operators

In order to assist Owner/Manager/Operators to ensure that vessel are in compliance, that the PMS has prepared new Technical Publication for the new IMO Data Collection System. The publication includes frequently ask questions with regards to the amendments of MARPOL Annex VI, the development of SEEMP Part II as well as other important information for the obligations of ship owners (for e.g. what happens if the ship changes managers etc.).

ACT NOW

To the Owners of vessels / Manager / operators / Representatives of Togo flagged vessels / Recognized-authorized ROs surveyors / Flag State Administrations.

In particular, from 1 January 2019, vessels must collect fuel oil consumption data according to a methodology which has to be described and included in the Ship Energy Efficiency Management Plan (SEEMP Part II) by latest 31 December 2018.

Thanks on kind cooperation with us.

Kind Regards,

CONTACT US



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Ajman Free Zone F.Z.E – P.O.BOX 8474 Ajman – Tel Fax 0097165560121-Mobil No 00971504500338 – Mail (pacific.m.s@eim.ae)
(pacific.m.s@eim.ae) بريد الكتروني – 00971504500338 رقم موبايل – 0097165560121 فاكس – (8474) عجمان المنطقة الحرة – ص.ب