

MARINE ENVIRONMENT PROTECTION
COMMITTEE
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Agenda item 6

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**FURTHER TECHNICAL AND OPERATIONAL MEASURES FOR ENHANCING THE
ENERGY EFFICIENCY OF INTERNATIONAL SHIPPING**

Implementation of the Data Collection System for fuel oil consumption of ships

Submitted by India and IACS

SUMMARY

<i>Executive summary:</i>	This document discusses the implementation of the requirements in chapter 4 of MARPOL Annex VI relating to the data collection system for fuel oil consumption of ships
<i>Strategic direction, if applicable:</i>	3
<i>Output:</i>	3.7
<i>Action to be taken:</i>	Paragraph 10
<i>Related documents:</i>	None

Background

1 At its seventieth session, the Marine Environment Protection Committee adopted amendments to chapter 4 of MARPOL Annex VI by resolution MEPC.278(70), which require all ships of 5,000 GT and above on international voyages to collect data related to fuel oil consumption (data collection system for fuel oil consumption of ships).

2 At MEPC 72, the Committee, having recognized the need for the smooth implementation and uniform application of the aforementioned amendments to MARPOL Annex VI, approved MEPC.1/Circ.876 on *Sample format for the confirmation of compliance, early submission of the SEEMP Part II on the ship fuel oil consumption data collection plan and its timely verification pursuant to regulation 5.4.5 of MARPOL Annex VI.*

Ships delivered on or after 1 January 2019 – description of the methodology to collect the data in the SEEMP and provision of confirmation of compliance

3 Regulation 22.2 of MARPOL Annex VI states:

"On or before 31 December 2018, in the case of a ship of 5,000 gross tonnage and above, the SEEMP shall include a description of the methodology that will be used to collect the data required by regulation 22A.1 of this Annex and the processes that will be used to report the data to the ship's Administration."

4 Noting the text of regulation 22.2 of MARPOL Annex VI, the co-sponsors understand that "new ships", delivered on or after 1 January 2019, are also to be provided with SEEMPs that include a description of the methodology that will be used to collect the data.

5 The co-sponsors also understand that "new ships", delivered on or after 1 January 2019, are to be provided with confirmation of compliance pursuant to regulation 5.4.5 of MARPOL Annex VI prior to collecting data i.e. at the time of the delivery of the ship.

6 The co-sponsors understand that regulation 22.2 of MARPOL Annex VI stipulates "31 December 2018" because these amendments entered into force on 1 March 2018 and the data collection system for fuel oil consumption of ships requires annual "calendar year" reporting. Consequently, the SEEMP needs to be submitted by 31 December 2018 (before the beginning of the first mandatory reporting year). However, this raises the question of how to deal with "new" ships delivered after 31 December 2018. The co-sponsors understand that the reporting year for these ships will start in the year of delivery of the ship, but there will only be partial reporting (i.e. for the period after the date of delivery) in the first reporting year. Nevertheless, in order to allow such reporting to commence from the date of delivery, the ship will need to have both a SEEMP that is in compliance with regulation 22.2 and confirmation of compliance as required by regulation 5.4.5.

7 Noting paragraphs 4 to 6 above, the co-sponsors are of the view that the Committee needs to develop, agree and disseminate an appropriate clarification as to how ships delivered on or after 1 January 2019 are to be treated. Draft text of such a clarification is provided in the annex to this document.

Necessity for unified interpretations

8 In addition to the issue discussed above, the co-sponsors request the Committee to consider the necessity for unified interpretations to be developed on the following issues:

.1 treatment of boil-off gas (BOG) from LNG carriers

While BOG might be considered outside the scope of the definition of "fuel oil" as provided in regulation 2.9 of MARPOL Annex VI, the co-sponsors consider that the BOG consumption should be collected and reported as fuel as part of the data collection system, noting its relevance to emissions of GHGs from ships; and

.2 meaning of "readily accessible" in regulation 22A.8 of MARPOL Annex VI

Regulation 22A.8 of MARPOL Annex VI states:

"...the disaggregated data that underlies the reported data noted in appendix IX to this Annex for the previous calendar year shall be readily accessible for a period of not less than 12 months from the end of that calendar year and be made available to the Administration upon request."

Noting the term "readily accessible", the co-sponsors consider that the disaggregated data is not required to be kept on board the ship; provided that access to the disaggregated data can be provided by the Company.

9 In relation to the above issues, the co-sponsors developed draft unified interpretations, as set out in the annex to this document.

Action requested of the Committee

10 The Committee is invited to consider the foregoing, in particular the proposals in paragraphs 7 and 9 above, and take action as appropriate.

ANNEX

PROPOSED UNIFIED INTERPRETATIONS

Clarification of regulations 5.4.5, 22.2 and 22.3 of MARPOL ANNEX VI

Regulation 5.4.5 reads:

The Administration shall ensure that for each ship to which regulation 22A applies, the SEEMP complies with regulation 22.2 of this Annex. This shall be done prior to collecting data under regulation 22A of this Annex in order to ensure the methodology and processes are in place prior to the beginning of the ship's first reporting period. Confirmation of compliance shall be provided to and retained on board the ship.

Regulation 22.2 reads:

On or before 31 December 2018, in the case of a ship of 5,000 gross tonnage and above, the SEEMP shall include a description of the methodology that will be used to collect the data required by regulation 22A.1 of this Annex and the processes that will be used to report the data to the ship's Administration.

Regulation 22.3 reads:

The SEEMP shall be developed taking into account guidelines adopted by the Organization.

Interpretation

Ships that are delivered on or after 1 January 2019 should be provided both with a SEEMP that is in compliance with regulation 22.2 and confirmation of compliance as required by regulation 5.4.5.

Draft unified interpretation of regulations 22A.1 and appendix IX of MARPOL ANNEX VI

Regulation 2.9 reads:

Fuel oil means any fuel delivered to and intended for combustion purposes for propulsion or operation on board a ship, including gas, distillate and residual fuels.

Regulation 22A.1 reads:

From calendar year 2019, each ship of 5,000 gross tonnage and above shall collect the data specified in appendix IX to this Annex, for that and each subsequent calendar year or portion thereof, as appropriate, according to the methodology included in the SEEMP.

Appendix IX reads:

Fuel oil consumption, by fuel oil type in metric tonnes and methods used for collecting fuel oil consumption data

Interpretation

Data relating to Boil-off Gas (BOG) consumed on board the ship for propulsion or operation is required to be collected and reported as fuel as part of the Data Collection System for fuel oil consumption of ships.

Draft unified interpretation of regulations 22A.8 of MARPOL ANNEX VI

Regulation 22A.8 reads:

Except as provided for in paragraphs 4, 5 and 6 of this regulation, the disaggregated data that underlies the reported data noted in appendix IX to this Annex for the previous calendar year shall be readily accessible for a period of not less than 12 months from the end of that calendar year and be made available to the Administration upon request.

Interpretation

The disaggregated data is not required to be kept onboard the vessel provided that access to the disaggregated data can be provided by the Company.
