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MARCIR: 02/2021

DATE: 23rd March 2021

To : Representatives of Gabon flagged vessels, Deputy Registrars, Ship-owners & Ship-operators, Masters, Recognized Organisation and Flag State Surveyors.

Subject: “IMO DCS: Deadline Approaching for Annual Submission of Fuel Oil Consumption Data (31/03/2021)”

Scope:

This Marine Circular aims to remind all interested parties operating ships registered in the International Ship Register of Gabon of the requirement for timely submission (31/03/2021) of an annual fuel consumption report for each calendar year, as per applicable IMO Regulations. This Marine Circular should be read in conjunction with Gabon MARCIR 09/2020, dated 25.04.2020.¹

References:

- A. MARPOL Annex VI, Regulation 22A (IMO DCS).
- B. EU Regulation 2015/757 (EU MRV), on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport, and amending Directive 2009/16/EC, 29 April 2015.
- C. I.S.R. Gabon MAR.CIR. 09/2020, dated 25.04.2020 «Subject: “Guidance on the “International Maritime Organization Data Collection System for Fuel Oil Consumption of Ships (IMO DCS)” and the European Union System for Monitoring, Reporting, and Verification of Carbon Dioxide Emissions from Maritime Transport (EU MRV)”».

IMO DCS – Issuance of Statement of Compliance – Reporting Data for Verification

1. As prescribed by I.S.R. of Gabon MARCIR. 09/2020, from 2020 onwards, ship operators of ships of 5,000 GT and above engaged in international shipping are required to submit annual

¹ Reference made to Regulations 6.6, 6.7, 22A and Appendices IX and X of Annex VI of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex VI), and International Maritime Organization (IMO) Resolution MEPC.293(71).



fuel oil consumption data to a Recognized Organization nominated by the Flag. Now with the second Data Collection System (DCS) reporting year recently ended, it is again time for reporting data on fuel oil consumption to the appointed RO, acting as DCS verifier. To ensure a Statement of Compliance (SoC) is issued in due time before 31 May 2021 as required, the deadline in MARPOL for reporting 2020 data for verification is 31 March 2021.

2. As prescribed by MARCIR. 09/2020 Regulation 22A of MARPOL Annex VI requires ships to collect and report data on their fuel consumption following a yearly cycle. Compliance is evident through the SoC issued annually on behalf of the flag of Gabon, confirming that the required data for the previous year was submitted in accordance with the methodology and process in the ship’s SEEMP (Ship Energy Efficiency Management Plan).

Fuel Consumption Data Submission

3. For ships to which this regulation applies², it is important that a valid SoC is readily available on board for inspection, together with the Confirmation of Compliance (CoC) for the SEEMP Part II. The CoC (SEEMP Part II) and the validity of the Statement of Compliance, SoC (DCS) will be checked at each periodical statutory survey. It is strongly advised to all interested parties to submit for the reporting year 2020 data to the appointed verifier, as soon as possible, at the latest on 31 March 2021, to ensure that an SoC is issued on time before 31 May 2021 as required.³

Application

4. This alert applies, as already indicated to all ships of 5,000 gross tonnage and above, including ships that may have been registered with or de-registered from the Gabonese flag during the calendar year for which the fuel consumption data submission is being prepared. In situations where a ship is under repair or conversion, or in extended lay-up, or remains otherwise out of active operations during the entire year, the requirements of this alert apply should the ship have consumed and/or bunkered any quantity of fuel during the year

5. The “Company”⁴ shall ensure that fuel consumption data for the previous year for ships to which Regulation 22A of MARPOL Annex VI applies is submitted to the Reporting

² The Regulations apply to ships of 5.000 gross tonnage and above. In conjunction to this threshold the IMO regulation applies to all ships in the Gabon International Registry fleet. The EU regulation applies to all ships that call on ports in Europe.

³ In accordance with IMO requirements, the Gabon Administration has authorized its RO’s to perform all relevant functions, as prescribed in the relevant IMO DCS and EU MRV clauses (see MAR.CIR. 09/2020, par. 4).

⁴ The “Company” is the entity responsible for the management of the ship in accordance with the ISM Code.

⁵ EU Regulation 2016/1927, on templates for monitoring plans, emissions reports and documents of compliance pursuant to Regulation (EU) 2015/757, 04 November 2016.



Organization by not later than 31 March. The Statement of Compliance required by Regulation 6.7 of MARPOL Annex VI is to be issued by the Reporting Organization by 31 May each year. This data should be collected in accordance with the methodology described in the ship's approved Ship Energy Efficiency Management Plan (SEEMP) Part II, and submitted with supporting evidence, to enable verification in line with Resolution MEPC.292(71).

EU MRV reporting to THETIS⁵

6. Equally important and not to be forgotten is the EU MRV reporting, in addition to the DCS reporting for vessels calling at EU ports. By 30 April 2021, companies need to submit the verified MRV Emissions Report to the EU Commission (THETIS). To ensure timely verification, companies should submit their MRV Emissions Reports for verification no later than 31 March 2021⁶

Recommendation to shipowners/managers

7. Considering the existing international regulatory requirements and the respective Port State Control relevance of the issue at hand, the I.S.R. of Gabon strongly recommends early submission of DCS data by 31 March 2021 at the latest. If there are any outstanding issues for any reason concerning the data reporting for 2020, or other reasons to believe that the SoC will not be issued before the deadline, the I.S.R. OF Gabon encourages ship owners/managers to contact their DCS verifier to avoid becoming non-compliant on 1 June 2021.

⁶ The EU regulation applies to all ships that call on ports in Europe. EU MRV Required Annual Emissions Report: The emissions and transport work data for each calendar year should be consolidated in an annual report, which would then be verified by an independent, accredited verifier by 30 April of each following year (see par. 15, of ref. c. I.S.R. Gabon MARCIR. 09/2020, dated 25.04.2020).