



DROMON
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Frequently Asked Questions (FAQ) / IMO Data Collection System

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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](#).

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:

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

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).

DBS has prepared a standardized format for annual reporting that can be downloaded free from our designated website: <http://dromon.com/imodcs/>

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:

- Identity of the ship:
 - a) IMO number;
- Period of calendar year for which the data is submitted:
 - a) Start date (dd/mm/yyyy)
 - b) End date (dd/mm/yyyy)
- 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) Ice class
- Fuel oil consumption, by fuel oil type in metric tonnes and methods used for collecting fuel oil consumption data
- Distance travelled:
 - a) Hours underway

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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

DBS has prepared a standardized format for SEEMP Part II that can be downloaded free from our designated website: <http://dromon.com/imodcs/>

17. How do I specify distance travelled?

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

- distance travelled over ground in nautical miles should be recorded in the log-book in accordance with SOLAS regulation V/28.13;
- 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
- 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.

20. Who issues the Statement of Compliance?

The Administration or any organization duly authorized by it. DBS acting as a Recognized Organization on behalf of various Administration can issue the require Statement of Compliance.

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.

22. How can DBS assist?

DBS is already accredited by the United Kingdom Accreditation Service (UKAS) under the ISO 14065 and can provide worldwide services associated with Regulation (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport (known as the EU MRV Regulation).

Since both schemes are anticipated to run in parallel our Society can act as a single Verification Body for both the IMO DCS and the EU MRV Regulation schemes. Since both schemes (i.e. the IMO and EU) have a number of similarities, the verification process can take place at one verification audit using the same source of data therefore, reducing the regulatory burden.

Under the IMO DCS, our Society can provide the following services:

- Review of the Ship Energy Management Plan (SEEMP);
- Verification of the reported data;
- Issuance of the Statement of Compliance.

Contact DBS at mrsv@dromon.com for further information and clarification.

The Liberia Registry has approved Dromon Bureau of Shipping (DBS) to provide verification services on the upcoming IMO data collection system for fuel oil consumption of ships. DBS can offer the following services to all Liberian flagged ships:

- Review of the Ship Energy Efficiency Management Plan (SEEMP);
- Verification of the reported data.

For further information visit DBS designated website: <http://dromon.com/imodcs/>