



Luxembourg, 20th July 2018

Circular CAM 004/2018 Rev. 2

Subject: IMO Data Collection System on fuel consumption
To: All Accredited Shipping Managers, ship owners, ship operators, Masters, designated persons of Luxembourg flagged ships, RO's and Flag State Inspectors
O/Ref.: AH/109336

This circular supplements CAM Circular 03/2017 on Regulation (EU) 2015/757 – MRV of CO₂ – revised

Purpose and scope

Amendments to Chapter 4 of MARPOL Annex VI, adopted at MEPC70 on 28 October 2016 ([Resolution MEPC.278\(70\)](#)), introduced the mandatory IMO Data Collection System (DCS). These amendments entered into force on 1 March 2018.

The DCS is the first step of the IMO roadmap which focuses on developing a comprehensive strategy for the reduction of GHG emissions from ships.

Requirements

Under the DCS, ships of 5,000 gross tonnage and above are required to collect consumption data for each type of fuel they use, as well as other, additional, specified data including proxies for transport work. This annual reporting of data is similar but not identical to the data required under the EU MRV Regulation. Furthermore, there is no obligation for ship companies to independently verify the data before submitting it to the IMO.

The aggregated data will have to be reported to the flag State at the end of each calendar year. Flag States have the obligation to verify the reported data (either themselves or using recognised organisations (RO)) using verification guidelines developed by the IMO. Following such verification, flag administrations issue a document of compliance to the ship company, which is a statutory duty. Flag administrations have the obligation then to report the data to the IMO Secretariat General.

The Commissariat aux affaires maritimes (CAM) has decided to delegate the verification process of the reported data. CAM is therefore bound by the applicable EU legislation and can only entrust a recognised organisation within the meaning of article 2(g) of Directive 2009/15/EC i.e. an RO recognised in accordance with Regulation (EC) n° 391/2009. Luxembourg has authorized ABS, BV, DNV-GL, KR, LR, NKK and RINA, all of them being also accredited as verifier in regards to the EU MRV Regulation.

Therefore, an entity which is an accredited verifier in the context of the EU MRV system, cannot rely on that status in order to perform the tasks related to the verification process under the IMO DCS. Only Luxembourg authorized ROs can perform the tasks under the two regimes for Luxembourg flagged ship.

Furthermore:

1. the RO reviewing the SEEMP Part II and issuing the Confirmation of Compliance does not necessarily need to act as RO for the issuance of the statutory certificates;
2. the RO verifying the ship's fuel data and issuing the Statement of Compliance does not necessarily need to act as RO for the issuance of the statutory certificates and can do so regardless of whether that RO has issued the ship's Confirmation of Compliance for the SEEMP Part II.

Adequate dissemination of this information within your company and to the Luxembourg flagged vessels which are affected is requested.



(s) Robert BIWER
Government Commissioner
for maritime affairs