Gibraltar Maritime Administration
HM Government of Gibraltar

Watergate House
2/8 Casemates Square
Gibraltar

Tel (+350)200 46862 / 200 47771 /200 50424
Fax (+350) 200 47770
e-mail: maritime.survey@gibraltar.gov.gi
maritime.registry@gibraltar.gov.gi

Shipping Guidance Notice 145

Amendments to MARPOL Annex VI, Regulation 27, Appendix IX

Enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS)

To: Ship Owners, Operators, Master's, and Recognised Organisations

References:

- MARPOL Annex VI, Regulation 27
- MARPOL Annex VI, Appendix IX
- Resolution MEPC.385(81) - Amendments to MARPOL Annex VI
- MEPC.1/Circ.913 – Guidance on the application of amendments to MARPOL Annex VI, Appendix IX
- REG-UI 006

1. Summary

1.1. Amendments to MARPOL Annex VI, Regulation 27, and Appendix IX have been adopted on 22 March 2024 via Resolution MEPC.385(81).

1.2. Within the adopted amendments are enhanced requirements in respect of the fuel consumption data reported within the IMO Ship Fuel Consumption Database (IMO DCS).

1.3. To date, all Ships of 5000 GT and above, subject to the MARPOL Convention should already be making annual submissions of DCS fuel data to IMO in respect of the total fuel bunkered for each fuel type for the entire year.

1.4. As a result of discussions at MEPC related to the CII, it was agreed for the reported data to facilitate a more granular DCS submission (Enhanced DCS), and which will record the fuel usage for each consumer onboard, i.e. Main Engine and Auxiliary Engine. The intention is to provide reliable data to facilitate the ongoing discussions in respect of modifications to attained annual operational carbon intensity indicator (attained annual operational CII) under MARPOL Annex VI, Regulation 28.

1.5. The controlling documents in respect of IMO DCS is the Ship Energy Efficiency Management Plan (SEEMP) required by Regulation 26, and in relation to the enhanced DCS, the SEEMP will require revision to incorporate the methodology in respect of enhanced DCS.

1.6. The enhanced DCS will continue to be reported annually.

2. Application

2.1. All Gibraltar registered ships of 5000 GT and above, subject to the MARPOL Convention.

2.2. The MARPOL enhanced DCS amendments enter into force on 1 August 2025, with reporting mandatory from 1 January 2026.

2.3. MEPC.385(81) invites parties to the MARPOL Convention to consider the early application of the amendments to Appendix IX with regards to enhanced DCS to be submitted to the IMO Ship Fuel Consumption Database from 1 January 2025. In this respect, The Red Ensign Group (REG) will not mandate the early adoption, but encourages the voluntarily early adoption in the case of ships provided with the necessary equipment and procedures allowing early adoption of enhanced DCS data as from 01 January 2025.

3. Guidance for Red Ensign Group (REG) ships

3.1. The REG have published the appended Unified Interpretation REG-UI 006 to clarify expectations for REG Flag vessels on how they should participate in the enhanced Data Collection System (DCS) submissions and the due dates for the different activities.

3.2. In respect of Gibraltar registered ships subject to the MARPOL Convention, Ship Owners, Operators, Master's, and Recognised Organisations, should in addition to MEPC.1/Circ.913 – Guidance on the application of amendments to MARPOL Annex VI, Appendix IX, familiarise themselves with the contents of REG-UI 006.

3.3. REG-UI 006 is additionally available via the Red Ensign Group (REG) website; Red Ensign Group

Steve Gomez – Chief Surveyor
For & on behalf of the Maritime Administrator

Issue date: 25 November 2024

All notices are available via https://www.gibraltarship.com/

This copy of the Administrative Instruction has been issued electronically and does not carry a signature or official stamp. A signed and stamped copy is available upon request.

Red Ensign Group

Unified Interpretation

REG-UI 006

Enhanced Collection of Fuel Usage Data

Notice to all Recognized Organizations, Ship Managers, Masters, Engineers.

This notice should be read with MEPC.385(81) and MEPC.1/Circ.913.

This REG-UI expires on 1 January 2026.

Summary

The purpose of this Technical Advisory Note is to clarify expectations for REG Flag vessels on how they should participate in the enhanced Data Collection System (DCS) submissions and the due dates for the different activities.

1. Introduction/ Background

1.1 All Ships of 5000 GT and above, subject to the MARPOL Convention should already be making annual submissions of DCS fuel data to IMO. To date ships have been submitting the original DCS data required by MEPC.293(71) and incorporated into MARPOL Annex VI, Appendix IX.

1.1.1 This data is reported each calendar year

1.1.2 REG Administrations have authorized our RO's to Verify the submission data.

1.1.3 The verifying RO does not need to be the RO of the vessel.

1.2 The original DCS data only recorded total fuel bunkered of each fuel type for the entire year. Due to discussions about issues related to the CII, it has been agreed for the database to facilitate a more granular DCS submission (Enhanced DCS) which will record fuel consumed in each consumer (Main Engine, Auxiliary Engine, onboard. This is intended to provide reliable data to facilitate the ongoing discussions of modifications to the CII.

1.2.1 The Enhanced DCS is still intended to be reported annually.

2. Measuring and Management

2.1 The control document for the DCS system is the SEEMP (Ship Energy Efficiency Management Plan).

2.1.1 The SEEMP must incorporate procedures for collecting and recording the required data.

2.2 The simplest and most direct method to record and report the enhanced DCS is by fitting flow meters for each consumer. These meters would then be read each year and the difference calculated.
  2.2.1 Photographic evidence of flow meter readings may be used in support of the required data submission.
  2.2.2 The RO verifying the submission may be sent the evidence and the completed submission at the agreed time.

2.3 The IMO also allow for systems of calculation and estimation to be used as the basis for submission of the Enhanced DCS.
  2.3.1 REG Administrations do not recommend the use of such systems for recording the enhanced DCS given the potential for the data to be compromised by inconsistencies over the course of a year.
  2.3.2 If such a system is to be used, the SEEMP must incorporate clear and detailed instructions of the measurements and estimates to be used for the submission.
  2.3.3 In this case the data will need to be accumulated consistently throughout the year

3. Implementation Timing

3.1 Gathering the enhanced DCS data is vital to allow informed discussions about what changes are needed to correct the perverse incentives of the CII.

3.2 Enhanced DCS will become mandatory for all ships on 1 August 2025.

3.3 Due to the nature of the DCS reporting system, it is only possible to make reports of a full Calendar year at a time.
  3.3.1 By default, therefore, the first full year that will be reported as enhanced DCS will be Calendar year 1 January 2026, to 31 December 2026, and will be submitted in January 2027.

3.4 IMO have requested Flag Administrations to announce if they will opt for ‘Early Adoption’.
  3.4.1 this would mean that all ships with that flag would be required to submit enhanced DCS data for calendar year 1 January 2025 to 31 December 2025 and be submitted in January 2026.

3.5 In order to participate in early adoption:
  3.5.1 Ships would ideally be fitted with flow meters for the individual fuel consumers.
  3.5.2 SEEMPs will need to be amended to include the procedures required for recording the data before 1 January 2025.

4. Guidance and REG Intentions

4.1 The REG group have concluded that there is insufficient time to mandate all ships in respect of all the member fleets, to have in place the equipment and procedures required in time to mandate early adoption.
  4.1.1 Therefore, the REG group will not mandate early adoption of enhanced DCS.

4.2 In recognition of the importance of collecting the enhanced DCS as early as possible, to facilitate ongoing discussions, the REG have agreed to encourage ship managers to voluntarily begin early adoption in the case of ships provided with the necessary equipment and procedures allowing early adoption of enhanced DCS data as from 1 January 2025.

5. Actions

5.1 Ship Managers of ships that may be capable of recording enhanced DCS data as from 1 January 2025, should contact their RO at the earliest opportunity in order to arrange the approval of the SEEMP and submission of procedures required to facilitate voluntary early adoption.

5.1.1 RO's are requested to expedite such applications to allow the voluntary reporting of ships provided with appropriate arrangements.

5.2 Ship managers of ships that are not able to begin gathering enhanced DCS data in time for early implementation, should begin preparations for the mandatory implementation date of 1 August 2025.

5.2.1 As from 1 August 2025 ships should have in place all required equipment for measuring or otherwise determining the fuel usage in each consumer.

5.2.2 As from 1 August 2025 the SEEMP should have been modified with all procedures required to complete the required measurements or alternative procedures.

5.2.3 Enhanced DCS data in all cases will be mandatory from 1 January 2026.

More Information

REG Secretariat, Maritime Governance, Improvement & Assurance
Maritime and Coastguard Agency
Bay 3/7
Spring Place
105 Commercial Road
Southampton
SO15 1EG

e-mail: REGsecretariat@mcga.gov.uk

Website Address: https://www.redensigngroup.org/publications/

REG Member Ref: REGTF2024#112

Published: November 2024
Please note that all addresses and telephone numbers are correct at time of publishing

Strength and quality through collaboration