



THE REPUBLIC OF LIBERIA
LIBERIA MARITIME AUTHORITY

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MARINE OPERATIONS NOTE 02/2018

(This Marine Operations Note revokes Marine Advisory 01/2018)

Subject: EU MRV & IMO DCS – CO2 Air Emissions

Reference:

- a. EU Regulation 2015/757 (EU MRV)
- b. MARPOL Annex VI, Regulation 22A (IMO DCS)
- c. IMO Resolution MEPC.282(70) - Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)
- d. IMO Resolution MEPC.278(70) - Amendments to MARPOL Annex VI (Data collection system for fuel oil consumption of ships)
- e. IMO Resolution MEPC.292(71) - 2017 Guidelines for Administration Verification of Ship Fuel Oil Consumption Data
- f. IMO Resolution MEPC.293(71) - 2017 Guidelines for the Development and Management of the IMO Ship Fuel Oil Consumption Database
- g. Marine Notice POL-009

Dear Shipowner/Operator/Master:

The purpose of this Marine Advisory is to provide guidance on compliance with EU MRV regulations, under reference a. and MARPOL, Annex VI, regulation 22A (IMO Data Collection System (DCS)).

General Overview

Both reference a. and b. apply to ships of 5000 gross tonnage and above.

The MARPOL regulation applies to all ships in the Liberian fleet. The flag Administration is responsible for ensuring compliance, including verification and reporting of ship fuel oil consumption data. The EU regulation applies to all ships that call on ports in Europe. The EU regulation includes a provision that the Commission shall review the regulation and shall, if appropriate, propose amendments to this regulation in order to ensure alignment with an international agreement (IMO DCS).

The Administration actively participated in the development of the IMO DCS and closely followed the development with the EU MRV Regulation in order to determine the most efficient way forward to serve our Liberian flag Shipowners. There are several common requirements between the two schemes, including monitoring, verification and annual data reporting. Considering the common requirements of the EU MRV and IMO DCS schemes, there are efficiencies to be gained in implementation both schemes by combining key compliance aspects to the extent possible. This will avoid unnecessary duplication, reduce administrative burdens and thus provide a cost-efficient, streamlined and quality focused service for shipowners covering both regulations.

Considering there are various entities that have been accredited under the EU MRV scheme, including Classification Societies recognized by Liberia, we are offering our Liberian flag shipowner and operators two options for a single service provider to cover both EU MRV and IMO DCS:

- 1) Classification Societies recognized by Liberia that have achieved EU MRV verifier accreditation (Classification Society Verifiers); or
- 2) Independent EU MRV accredited verifiers (non-Classification Society Verifiers)

Shipowners have the option to choose either a Classification Society Verifier or a non-Classification Society Verifier. The Verifier will undertake all the verification work covering both the EU MRV and IMO DCS regulations. The Verifier will conduct the complete verification services required for the EU MRV, including issuance of the approval documentation and reporting. The Verifier will conduct the verification services required for the IMO DCS and the Administration will issue the approval documentation and report the required data to IMO.

Appendix 1 contains the list of Classification Societies recognized by Liberia and independent EU MRV accredited verifiers with whom the Administration has entered into a cooperation agreement for delivering this service. Each offers shipowners a streamlined and combined compliance service covering both the EU MRV and IMO DCS regulations.

Compliance Process

The implementation schedule shown in Appendix 2, and in summary the Classification Societies Verifiers recognized by Liberia and non-Classification Society Verifiers will undertake all the necessary work with the exception of the following tasks that will be carried out by the Administration:

- Issuance of SEEMP (Part II) Confirmation of Compliance with MARPOL, Annex VI, Regulation 22;
- Issuance of annual fuel oil consumption Statement of Compliance with MARPOL, Annex VI, Regulation 22A;
- On-board verification of Confirmation of Compliance and Statement of Compliance;
- Mandatory annual IMO DCS reporting under MARPOL, Annex VI, Regulation 22A.

The Administration's fee for this service is USD375 per ship each year services are performed. The Classification Society Verifier or the non-Classification Society Verifier selected for the combined EU MRV and IMO DCS services will invoice the shipowner/operator directly for this service.

For more information, please contact the Technical Department at technical@liscr.com or telephone +1 703 790 3434.

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Appendix 1 - LIST OF AUTHORISED EU MRV & IMO DCS VERIFIERS

Classification Societies Verifiers

American Bureau of Shipping (ABS)
Bureau Veritas (BV)
China Classification Society (CCS)
Croatian Registry of Shipping
DNV GL
Indian Register of Shipping (IRS)
Korean Register of Shipping (KR)
Lloyd's Register (LR)
Nippon Kaiji Kyokai (NK)
Polski Rejestr Statkow (PRS)
Registro Italiano Navale (RINA)
Russian Maritime Register of Shipping (RS)

non-Classification Society Verifiers

VERIFAVIA (UK) LTD / VERIFAVIA SARL, France
Swiss Climate EcoCare, Germany
Dromon Bureau of Shipping, Cyprus
EMICERT L.T.D., Greece
ICS VERIFICATION SERVICES SINGLE MEMBER P.C.

Appendix 2 - Implementation

Step	Shipowners/managers	Classification Societies recognized by Liberia or non- Classification Society Verifiers	The Liberian Administration	EU MRV Key Dates	IMO DCS Key Dates
1	Select a service provider from Appendix 1				
2	Establish Contract for EU MRV & IMO DCS				
3	Prepare Monitoring Plan (EU) and updated SEEMP (IMO)				
4		Review the MP and SEEMP			
5		Upon satisfactory verification of the MP issue the required acceptance/approval to the shipowner		by 31 December 2017	
6		Upon satisfactory verification confirm compliance for the updated SEEMP to the Administration			
7			Upon satisfactory review issue formal Confirmation of Compliance for the updated SEEMP to the Shipowner		by 31 December 2018
8	Start collecting the fuel oil consumption and other required data as per the approved MP and updated SEEMP.			1 January 2018	1 January 2019
9	Annual data as per the MP and updated SEEMP submitted to the Classification Societies recognized by Liberia or non- Classification Society Verifier			by 31 March 2019	by 31 March 2020
10		Upon satisfactory verification issue a Document of Compliance to the Shipowner			
11		Upon satisfactory verification of the annual data for the IMO DCS confirm compliance to the Administration			
12			Upon satisfactory review issue formal Statement of Compliance with the IMO DCS to the Shipowner		by 31 May 2020
13	Report required annual data to EU MRV database			by 30 April 2019	
14			Report required annual data to IMO GISIS Database		by 31 May 2020

Steps 1 and 2: Initial and for contract renewal and change of Verifier

Steps 3 to 7: Initial and whenever any modifications are made

Steps 8 to 14: Repeated every year

EU MRV
IMO DCS
IMO DCS + EU MRV
Deadlines