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## Notice on IMO DCS for the verification of ship Emission Report in the event of a change of Flag or Company

According to the requirements of IMO RESOLUTION MEPC.278 (70) Amendments to MARPOL Annex VI Data collection system for fuel oil consumption of ships, from January 1, 2019, fuel consumption data collection is mandatory for the vessels of 5000 gross tonnage and above. And following the end of each calendar year, but not later than March 31 of the subsequent year, the ship shall submit a report of fuel consumption data covering the previous year to its competent authority ("the Flag Administration") or Recognized Organization ("RO"). However, in the event of change of flag and/or management company, the ship, on the day of the completion of the change, or as close as possible, shall report to the losing Flag Administration or RO the aggregate data for the period of the calendar year corresponding to that Flag Administration. A Statement of Compliance ("SOC") must be issued after successful completion of verification by the Flag Administration or its RO.

Meanwhile, ship owners and companies shall pay attention to the special requirements of the flag states, such as:

P.R. China: In the event of change of Flag and/or Ship owner/Operator, the ship shall report the aggregate data of the corresponding period of time within three months since the day of completion of the change; See Annex 1 for details.

HONG KONG: In the event of change of Flag and/or Ship owner/Operator, the (original) ship owner or company shall report the aggregate data of the corresponding period of time within 30 days since the day of completion of the change; See Annex 2 for details.

PALAU: In the event of change of Flag and/or Ship owner/Operator, the ship shall report the aggregate data of the corresponding period of time on the day of completion of the change or as close as possible. See Annex 3 for details.

In order to avoid unnecessary trouble or loss to the company, it is recommended that the ship owner and management company:

- 1) familiarize with, comply with and fulfil the Convention and flag State requirements;
- 2) If the flag and company have been changed after January 1, 2019, the aggregate data for the corresponding period of time shall be reported to the flag Administration or its RO as soon as possible.
- 3) In the event of change of Ship owner and /or Company, it is suggested that the original owner/company and the new owner/company shall ensure that the ship can obtain the pre-change ship emission report and the corresponding SOC in a timely manner through negotiations, contracts or agreements and other effective ways.
- 4) In the event of change of flag, company, etc., the original ship

owner or management company shall submit an application for verification of emission report to the CCS branch or office where the company is located, and provide complete energy consumption data and relevant legal logs of sampling voyages, BDN, oil record book and other supporting materials for the corresponding period of time as required. In special cases, if the original shipowner or management company has cancelled or lost its management ability, or the two parties have reached an agreement, the new shipowner or management company may submit an application and related documents to the CCS branch or office where the company is located.

Annex 1: The Notice of China MSA Regarding to issuance of Regulation on Data Collection for Energy Consumption of Ships

Annex 2: Merchant Shipping (Prevention of Air Pollution) (Amendment) Regulation 2019 (Cap. 413P)

Annex 3: Palau MARINE CIRCULAR 145.1

Please contact Classed Ships in Service Dept. of CCS Headquarters for any questions during the implementation of this circular.

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