FREQUENTLY ASKED QUESTIONS: SINGAPORE'S VOLUNTARY EXPERIENCE BUILDING PHASE (VEBP) OF THE IMO DATA COLLECTION SYSTEM FOR FUEL OIL CONSUMPTION (last updated on 1 December 2017)

1) When will the voluntary experience building phase (VEBP) begin? Why is MPA inviting the shipping community to participate in the VEBP?

1st January 2018 for the entire calendar year of 2018. MPA will be embarking on a VEBP of the data collection requirements of the DCS to serve as an experience building exercise for Singapore-registered ships. This will help MPA and the shipping community ensure the smooth implementation of the DCS from calendar year 2019 onwards and identify any issues relating to the implementation of the DCS.

2) Which Singapore-registered ships would be able to participate in the VEBP?

The VEBP will be applicable to all Singapore-registered ships of 5,000 gross tonnage and above. The VEBP will not be applicable to ships solely engaged in voyages within the port limits of Singapore and ships not propelled by mechanical means, and platforms including FPSOs and FSUs and drilling rigs, regardless of their propulsion.

3) Is the VEBP mandatory for all Singapore-registered ships?

The VEBP is a voluntary exercise. All ship owners, ship managers, and operators of Singapore-registered ships are encouraged to participate in the VEBP and to make arrangements with any of the MPA-recognised organisation before 1st January 2018.

4) Which data items should to be collected and reported to an MPA-recognised organisation?

Each ship should collect and report the data specified in Appendix IX of MARPOL Annex VI. A sample of a standardised data reporting format for the DCS can be found at Annex B of this shipping circular.

- Identity of the ship
 - o IMO number
- Period of calendar year for which the data is submitted
 - Start date (dd/mm/yyyy)
 - End date (dd/mm/yyyy)
- Technical characteristics of the ship
 - Ship type, as defined in regulation 2 of MARPOL Annex VI or other (to be stated)
 - Gross tonnage (GT)
 - Net tonnage (NT)
 - Deadweight tonnage (DWT)

- Power output (rated power) of main and auxiliary reciprocating internal combustion engines over 130 kW (to be stated in kW)
- o EEDI (if applicable)
- o lce class (if applicable)
- Fuel oil consumption, by fuel oil type in metric tonnes and methods used for collecting fuel oil consumption data
- Distance travelled
- Hours underway
- 5) Which organisations are recognised by MPA to collect and report ships' data to MPA for the VEBP? What about the MARPOL Annex VI requirements on revising the SEEMP (i.e. Ship Fuel Oil Consumption Data Collection Plan), data verification and the Statement of Compliance etc.?

During the VEBP in 2018, each participating ship should report the data to any of the classification societies authorised by MPA as recognised organisations. When the mandatory MARPOL Annex VI DCS requirements becomes applicable, the MARPOL Annex VI requirements on revising the SEEMP (i.e. Ship Fuel Oil Consumption Data Collection Plan), data verification and the Statement of Compliance can be done by any of MPA's existing recognised organisations.

6) MARPOL Annex VI requires a ship's SEEMP to be revised and approved with a Ship Fuel Oil Consumption Data Collection Plan on or before 31 December 2018. Does a ship's revised SEEMP need to be revised and approved for the VEBP? What about other requirements such as data verification and the Statement of Compliance etc.?

The VEBP only applies to collecting and reporting ships' fuel oil consumption data. The timelines and requirements as stated in MARPOL Annex VI for revising the SEEMP (i.e. Ship Fuel Oil Consumption Data Collection Plan), data verification and the Statement of Compliance etc. will apply.

Ship owners, ship managers, and operators of Singapore-registered ships are advised to prepare and submit their Ship Fuel Oil Consumption Data Collection Plan well in advance of the 31 December 2018 deadline.

7) What accompanying documents need to be reported by the ship apart from the data specified in Appendix IX of MARPOL Annex VI?

No accompanying documents are required to be submitted for the VEBP because no verification of the data is required during the VEBP.

8) What are the collection and reporting periods for the monthly data sets?

Each ship should collect fuel oil consumption by fuel oil type, distance travelled and hours underway on a daily basis from 1200hrs Local Time to 1200hrs Local Time. Each month's data starts from 1200hrs LT of the first day of the month and ends at 1200hrs LT on the first day of the subsequent month.

At the end of each month, the monthly data set to be collected and reported is the daily noon to noon values and the aggregated values for the month.

9) What fuel oil consumption data does the ship have to collect and report?

The ship should collect and report fuel oil consumption by fuel oil type in metric tonnes and methods used for collecting fuel oil consumption data. This includes all the fuel oil consumed on board including but not limited to the fuel oil consumed by the main engines, auxiliary engines, gas turbines, main/auxiliary boilers and inert gas generator, for each type of fuel oil consumed, regardless of the operations of the ship, i.e. underway, at berth, at anchorage, cargo operations, cargo heating, tank cleaning, etc.

This should be done in accordance with Appendix IX of MARPOL Annex VI and the 2016 SEEMP Guidelines (see paragraphs 7.1 - 7.3).

10) What constitutes "distance travelled" and "hours underway"?

The ship should collect and report "distance travelled" and "hours underway" in accordance with Regulation 2.50 and Appendix IX of MARPOL Annex VI and the 2016 SEEMP Guidelines (see paragraphs 7.4 and 7.5).

"Distance travelled" should be distance travelled over ground in nautical miles while the ship is underway under its own propulsion. "Hours underway" should be while the ship is underway under its own propulsion.

In view of the above, MPA considers the recording of "distance travelled" and "hours underway" to be from Standby Engines (SBE) to Finish With Engines (FWE) as per the ship's Arrival/Noon/Departure reports.

11) What if the ship changes company¹?

In the event of a change from one company to another (e.g. 15 January), the ship should on the day of completion of the change or as close as practical thereto report to its MPA-recognised organisation the required data for the portion of the month corresponding to the company (e.g. 1 - 14 January). Subsequently, the MPA-recognised organisation will report that portion of the month's data set to MPA.

12) What if the ship changes Flag Administration?

In the event of the transfer of a ship into the Singapore Registry of Ships (e.g. 15 January), the ship should on the day of completion of the transfer or as close as practical thereto begin to collect the required data. The ship should also report the required data for the portion of the month (e.g. 16-31 January) at the end of the month to a MPA-recognised organisation. Subsequently, the MPA-recognised

¹ According to Regulation 2.49 of MARPOL Annex VI: "Company means the owner of the ship or any other organization or person such as the manager, or the bareboat charterer, who has assumed the responsibility for operation of the ship from the owner of the ship and who on assuming such responsibility has agreed to take over all the duties and responsibilities imposed by the *International Management Code for the Safe Operation of Ships and for Pollution Prevention*, as amended."

organisation will report that portion of the month's data set to MPA. This report to MPA should be done within a month after the end of each month (e.g. 28 February).

In the event of the transfer of a ship out of the Singapore Registry of Ships (e.g. 15 January), the ship should on the day of completion of the transfer or as close as practical thereto report the required data for the portion of the month (e.g. 1-14 January) to a MPA-recognised organisation. Subsequently, the MPA-recognised organisation will report that portion of the month's data set to MPA.

13) What if the ship changes recognised organisation that handles its DCS?

In the event of a change from one MPA-recognised organisation to another (e.g. 15 January), the ship should on the day of completion of the change or as close as practical thereto report to the losing MPA-recognised organisation the required data for the portion of the month corresponding to the MPA-recognised organisation (e.g. 1 – 14 January). Subsequently, the losing MPA-recognised organisation will report that portion of the month's data set to MPA.

14) What will MPA do with the reported data?

MPA and MPA's approved entities may use the data for research purposes. All data and identities reported to MPA will be treated as confidential and anonymised.