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INFORMATION BULLETIN No. 172

Fuel Consumption Data Collection and Reporting

Guidance and Instructions for Bahamas Recognised Organisations, Bahamas Approved Nautical Inspectors, Ship Owners, Managers and Masters

1. Purpose

1.1. This Bulletin is intended to provide guidance to Companies[1] operating Bahamian ships on fuel consumption data reporting, as required by Regulation 22A of Annex IV of the International Convention for the Prevention of Pollution from Ships (MARPOL Annex VI).

1.2. This Bulletin should be read in conjunction with Regulations 22 & 22A and Appendices IX & X of MARPOL Annex VI, and IMO Resolutions MEPC.282(70) and MEPC.292(71).

2. Application

2.1. This Bulletin applies to all Bahamian ships of 5000 gross tonnage and above to which Chapter 4 of MARPOL Annex VI applies.

2.2. Chapter 4 of MARPOL Annex VI applies to all ships of 400 gross tonnage and above, with the exception of:

i. ships not propelled by mechanical means;
ii. offshore platforms, including FPSOs and FSUs and drilling rigs, regardless of their propulsion;
iii. ships operating exclusively in Bahamian waters, provided that such ships are constructed and act in a manner consistent with Chapter 4 so far as is reasonable and practicable.

[1] The Company is the entity responsible for the management of the ship in accordance with the ISM Code. For ships to which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Merchant Shipping Act

2.3. Fuel consumption data collection is mandatory for the ships referred to in paragraph 2.1 from 01 January 2019.

2.4. The provisions of this Bulletin may be voluntarily adopted for ships of less than 5000 gross tonnage.

3. Introduction

3.1. As of 01 January 2019, all ships to which this Bulletin applies shall comply with Regulation 22A of MARPOL Annex VI. This requires the compilation and reporting of, *inter alia*, fuel consumption, hours of operation and distance travelled for each calendar year ("fuel consumption data").

3.2. Following the end of each calendar year, by not later than 31 March of the subsequent year, the Company is to submit a report of fuel consumption data covering the previous year (or part thereof where the Company, Class Society or Flag has changed during the year) to the nominated Reporting Organisation. The first fuel consumption data report shall therefore be submitted by not later than **31 March 2020**.

3.3. In order to fulfil the required reporting provisions, all ships to which this Bulletin applies shall have their Shipboard Energy Efficiency Management Plans (SEEMPs) amended to include the data collection methodology and the procedure for data reporting and verification, by not later than **31 December 2018**.

3.4. The amended SEEMP should be verified by the nominated Reporting Organisation, prior to reporting of the fuel consumption data commences. On successful verification of the amended SEEMP, the Reporting Organisation is to issue confirmation of compliance to the ship, in accordance with Regulation 5.4.5 of MARPOL Annex VI.

3.5. Where there is a change of nominated Reporting Organisation, the data collection methodology and reporting procedures in the ship's SEEMP shall be verified by the new Reporting Organisation and confirmation of compliance issued to the ship.

4. Reporting Organisation for Fuel Consumption Data Collection

4.1. The BMA has authorised its existing Recognised Organisations[2] to act as Reporting Organisations in order to collect, and verify fuel consumption data from Bahamian ships, and to report to IMO in accordance with the provisions of Regulation 22A of MARPOL Annex VI.

4.2. The Reporting Organisation does not need not be the Recognised Organisation that classes the ship, though this may streamline the fuel consumption data collection, verification and reporting process.

4.3. Any documents used as a source of information for gathering of fuel consumption data shall be retained on board for not less than 12 months after the end of the respective calendar year. Such documents shall be made available to the BMA and/or Recognised Organisation that classes the ship upon request.

5. Reporting of Fuel Consumption Data

5.1. Reporting of fuel consumption data shall be completed for each ship individually based on the report format indicated in Appendix IX of MARPOL Annex VI. IMO will preserve reported data in such a way as to preclude identification of any individual ship for which the data had been submitted.

5.2. In accordance with Appendix IX of MARPOL Annex VI, the following information is to be included in annual cumulative fuel consumption data report:

i. Identity of the ship: IMO number, ship type, gross tonnage, net tonnage, deadweight, rated power of each main and/or auxiliary reciprocating internal combustion engine over 130 kW, Attained EEDI (where applicable), Ice Class;
ii. Every type of fuel oil consumption on board for any purpose (engines, boilers, incinerator, inert gas generators, heaters etc.), in metric tonnes;
iii. distance travelled over the ground;
iv. hours underway;
v. information on the method used to collect fuel consumption data as required by Regulation 22A of MARPOL Annex VI.

[2] Refer to BMA Information Bulletin No. 3

5.3. The BMA considers methods of collection of fuel consumption data to be acceptable if based on the following:

i. Fuel quantities bunkered as taken from Bunker Delivery Note (BDN); or
ii. Fuel quantities bunkered as taken from Code H entries in the Oil Record Book Part I; or
iii. Fuel day tank(s) sounding records; or
iv. Fuel meter readings[3]; or
v. Fuel quantity details based on arrival and departure notice.

5.4. Reporting of direct CO_2 emission measurements is not mandatory. This method may however be utilised concurrently where necessary equipment is installed on board to supplement the fuel consumption data report.

5.5. When the Reporting Organisation has received fuel consumption data from a ship and verified that it has been collected and reported in accordance with paragraphs 5.2 and 5.3 above, a Statement of Compliance shall be issued to the ship confirming the submission of the data required for the period. The format of the Statement of Compliance can be found in Appendix X of MARPOL Annex VI.

5.6. Each Statement of Compliance will remain valid for the duration of the calendar year when it was issued and for the first five months of the next calendar year.

5.7. Expired Statements of Compliance are not required to be retained beyond their expiration date, once a new statement has been issued and delivered on board.

5.8. In situations where a ship is not in a position to obtain a new Statement of Compliance following the end of a calendar year due to lay-up, conversion of period of inactivity, the last issued Statement of Compliance shall be retained on board for inspection.

5.9. Submitted fuel consumption data shall be verified by the Reporting Organisation for consistency and accuracy as required by Regulation 22A.7 of MARPOL VI. IMO has developed a set of guidelines aiming to facilitate such verification which can be found in Resolution MEPC.292(71).

5.10. The method of fuel consumption data verification and any additional documents that may need to be provided to the Reporting Organisation

[3] Where fuel meters are used, a backup method must be described for use in case of fuel meter malfunction. Accuracy of fuel meters shall be verified by a competent person on annual basis.

along with the annual fuel consumption data collection report shall be clearly addressed in the SEEMP. Such verification may be undertaken based on one of the methods addressed in 5.3 above but should not be the same method used for the annual fuel consumption data collection.

6. Measures to Improve Efficiency

6.1. Certain steps may be considered by the Company to improve fuel consumption efficiency on board a ship, such as hull drag minimisation, draft optimisation, propeller and rudder blade flow improvement devices and others.

6.2. The BMA welcomes any innovative solution aimed to improve fuel consumption efficiency board.

7. EU MRV Reporting

7.1. Submission of data pursuant to Regulation (EU) 2015/757 stipulating the European requirements on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport (MRV), is in addition to the provisions of MARPOL Annex VI.

7.2. It is anticipated that the MRV and MARPOL Annex VI requirements will eventually be aligned to reduce administrative burden, as some ships will need to report the same data twice. However, so far there are no firm indications of the timescale for alignment of the MRV and MARPOL Annex VI requirements.

7.3. Where a Bahamas Recognised Organisation has been accredited as an MRV verifier, the BMA has no objections to fuel consumption data and MRV reporting to be combined, provided that the combined reports provide all of the information required by Regulation 22A of MARPOL Annex VI.

8. Revision History

Rev.1 (05 June 2018) – Sections 1, 3, 4 and 5 updated, new text in blue

Rev.0 (20 December 2017) – First issue