



Marine Circular Nr. 11/ 2022, 08/12/2022

**Subject: “Fuel Consumption Data and Recording – MARPOL Annex VI - EEXI and CII MEPC.328(76)”**

**Ref.:**

- a. MARPOL, International Convention for the Prevention of Pollution from Ships, Consolidated Edition 2017.
- b. IMO Resolution MEPC.328(76) dated on June 17, 2021(Revised MARPOL Annex VI).
- c. IMO Resolution MEPC.338(76), 2021 Guidelines on the operational carbon intensity reduction factors relative to reference lines (CII reduction factors guidelines, G3), adopted 17 June 2021
- d. IMO Resolution MEPC.346(78), 2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP), adopted 10 June 2022
- e. IMO Resolution MEPC.349(78), 2022 Guidelines for the development and management of the IMO Ship Fuel Oil Consumption Database, adopted 10 June 2022.
- f. IMO Resolution MEPC.348(78), 2022 Guidelines for Administration verification of ship fuel oil consumption data and operational carbon intensity, adopted 10 June 2022

**To:** Ship owners, Ship managers, Legal Representatives of G-B I.S.R. Vessels, Masters, G-B I.S.R. Recognized Organizations, ISM Managers.

**Purpose:** The current Marine Circular provides information and guidance to Shipowners and Managers operating G-B I.S.R. registered vessels, as well as to other interested parties, regarding the IMO Data Collection System for Fuel Oil consumption (DSC) in accordance with relevant MARPOL Annex VI Regulations, as amended. In addition, provides instructions and guidance to Companies operating G-B ISR vessels on fuel consumption data reporting, as required under Regulation 26, and necessary preparations for the introduction of a Carbon Intensity Index rating (CII) per Regulation 28 of Annex VI of the International Convention for the Prevention of Pollution from Ships 1973, as amended (MARPOL Annex VI). The Mar Cir also outlines G-B I.S.R. general guidance towards compliance with fuel consumption monitoring, reporting, and verification requirements for ships calling at European Union (EU) and/or United Kingdom (UK) ports (EU & UK MRV).

## 1. Applicability

**1.1** MARPOL Annex VI applies to all ships, except where expressly provided for in Annex VI. In general, all G-B I.S.R. ships of 400 gross tonnage and above, engaged on international voyages, shall be surveyed and certificated in accordance with Regulations 5 and 6 of MARPOL Annex VI by the Recognised Organisation responsible for issuing the statutory certification.

**1.2** Specifically, fuel consumption data reporting, as required under Regulation 26 applies to all ships of 5,000 gross tonnage and above with the exception of:

- a. ships not propelled by mechanical means;
- b. offshore platforms, and drilling rigs, including Floating Production, Storage, and Offloading Facilities (FPSOs), Floating Storage Units (FSUs), Floating (Storage) and Regasification Units (FRU or FSRUs), Floating Liquefied Natural Gas (FLNG), and drilling rigs, regardless of their propulsion;

Page 1 of 7



**1.3** Fuel consumption data collection and annual operational CII rating requirements also apply to ships that may have joined or left the G-B I.S.R. during the calendar year for which only data for a partial annual submission is available.

## **2. Background – Legislative Context – IMO Deliberations.**

**2.1** MARPOL Annex VI has been adopted by the IMO Member States to prevent air pollution from emissions from ships. The concrete Annex entered into force internationally in 2005 and has been revised several times since. It is noted that a complete revision of MARPOL Annex VI text entered into force on 1 November 2022 (see attachment to this Mar Cir).

**2.2** The International Maritime Organization through the competent Marine Environment Protection Committee MEPC 67 held on October 2014, agreed to develop a collection system for ships, and, agreed also on the general description of the data to use for this collection system for fuel consumption of ships. To this system as core elements have been included the following: data collection by ships, flag State functions in relation to data collection, and establishment of a centralized database by the Organization.

**2.3** Moreover, on October 2016 the MEPC 70 adopted mandatory MARPOL Annex VI requirements for ships to record and report their fuel oil consumption through Resolution MEPC.278(70), which entered into force on March 1, 2018.

**2.4** The Carbon Intensity Indicator, CII, introduced by IMO, is a short-term measure to reach the target of a 40% reduction in CO<sub>2</sub> emissions by 2030. It was decided during the MEPC 75 meeting that the ships with more than 5000 GT have to report their annual attained carbon intensity to the Flag Administration. Based on the CII value, a rating will be assigned to each ship that will determine the performance of the ship and consequently, its viability.

**2.5** Most recently, IMO's MEPC 76 and MEPC 78 adopted amendments to MARPOL Annex VI, as part of its short-term measures under the IMO GHG Reduction Strategy. New regulations have been introduced on Energy Efficiency Existing Ships Index (EEXI) and Carbon Intensity Indicator (CII). In this respect, the revised MARPOL Annex VI (RESOLUTION MEPC.328(76)) entered into force on 1st November 2022. The concrete amendments aimed to reduce ship's greenhouse gas emissions, including technical and operational measures requiring all ships to calculate their Energy Efficiency existing ship Index (EEXI) and their Annual Operational Carbon Intensity Indicator (CII), to determine operational carbon intensity rating to improve the energy efficiency of ships.

**2.6** It is outlined that from 2023 onwards, there will be three parts of SEEMP that a company has to maintain:

**a.** SEEMP Part I: SHIP MANAGEMENT PLAN TO IMPROVE ENERGY EFFICIENCY (to be maintained by ships more than 400 GT; related to EEOI and other voluntary measures the company is taking to improve its operational efficiency).

**b.** SEEMP Part II: SHIP FUEL OIL CONSUMPTION DATA COLLECTION PLAN (to be maintained by ships more than 5000 GT; related to IMO DCS data monitoring and reporting to the administration)

**c.** SEEMP Part III: SHIP OPERATIONAL CARBON INTENSITY PLAN (to be maintained by ships more than 5000 GT; related to calculation of CII and implementing measures to reduce it).



### 3. Foreseen Periodical Timeline for Fuel Consumption Data Submission

**3.1 Significant due date 31<sup>st</sup> of March:** G-B ISR vessel's operating companies shall ensure that fuel consumption data and the attained annual operational CII index for the previous year for ships to which Regulation 27 and 28 of MARPOL Annex VI apply is submitted to the Reporting Organization/Verifier by not later than 31 March.

**3.2 Significant due date 31<sup>st</sup> of May:** The Statement of Compliance required by Regulation 6.4 of MARPOL Annex VI is to be issued by the Reporting Organization/Verifier by 31 May each year.

**3.3 Significant due date 30<sup>th</sup> of June:** Verified fuel consumption and attained annual operational CII index data is to be uploaded to the IMO Global Integrated Shipping Information System (GISIS) by the Reporting Organization/Verifier within 1 month after issuing the Statement of Compliance but not later than 30 June each year.

**3.4** It should be highlighted that when preparing the annual fuel consumption reports for their individual fleet, the Managing Company should be aware that submission is also required for a part of a year if a ship has left or been accepted to their management, joined or left the G-B I.S.R., or has been recycled before 31 December. In addition, the reporting of the fuel consumption data is required on the day of completion of the transfer from one flag to another or of the change from one company to another, or if this is not applicable for practical reasons, as close as practical thereto.

### 4. SEEMP Part II and Fuel Consumption Data Collection Methodology Plan

**4.1** To fulfill the required reporting provisions, all ships to which the reporting requirements apply should include the data collection methodology, given in the Data Collection Plan and the procedure for data reporting and verification in the Shipboard Energy Efficiency Management Plans (SEEMP), especially in Part II of the SEEMP.

### 5. Ship Fuel Oil Consumption Data Collection Plan.

**5.1** The SEEMP should be verified by the nominated Reporting Organization/Verifier, before the commencement of fuel consumption data reporting. On successful verification of the amended SEEMP, the Reporting Organization/Verifier is to issue a Confirmation of Compliance to the ship, in accordance with Regulation of MARPOL Annex VI. Where there is a change of nominated Reporting Organization/Verifier, the new Reporting Organization/Verifier shall obtain the SEEMP Part II verified by the previous Recognized Organization/Verifier and the related Confirmation of Compliance and take those to their files as a basis for later verifications.

**5.2** For all G-B I.S.R. registered vessels the SEEMP Parts I & II and Confirmation of Compliance shall be kept on board.

### 6. SEEMP Part III

**6.1** As of January 1, 2023, G-B I.S.R. ships of 5,000 GT and above must have a verified ship energy efficiency management plan or SEEMP part III and the evidence of a reduction in carbon intensity must be registered in a new section of the Management System of Carbon Intensity (SEEMP) existing of the ship. In the same context it is noted that once a G-B I.S.R. registered vessel has the SEEMP part III on board, it



will be need to start executing the articulated plan, including the implementation of some or all the energy efficiency measures, if applicable.

**6.2** The Ship Energy Efficiency Management Plan (SEEMP) Part III is a Ship Operational Carbon Intensity Plan and as per relevant IMO MEPC guidelines it must include as a minimum:

- .1 a description of the methodology that will be used to calculate the ship's attained annual operational Carbon Intensity Indicator (CII).
- .2 The processes that will be used to report this value to the ship's Administration.
- .3 The required annual operational CII for the next three years.
- .4 An implementation plan documenting how the required annual operational CII will be achieved during the next three years; and
- .5 a procedure for self-evaluation and improvement.

**6.3** It is emphasized that necessary amendments to the existing SEEMP should be completed and verified by the Reporting Organization/Verifier on or before 01 January 2023. On successful verification of the amended SEEMP, the Reporting Organization/Verifier is to issue a Confirmation of Compliance to the ship, in accordance with Regulation 5.4.6 of MARPOL Annex VI.

## 7. Reporting Organizations / Verifiers

**7.1** For all G-B I.S.R. registered vessels all MARPOL Annex VI surveys, approvals, and issuance of certificates are through the current Mar Cir delegated to the Recognized Organizations (ROs) and potential other independent verifiers. The G-B I.S.R. has authorized its existing Recognized Organizations<sup>1</sup> to act as Reporting Organizations/Verifiers to collect, and verify fuel consumption data from G-B I.S.R. ships, and to report to IMO following the provisions of the applicable Regulation of MARPOL Annex VI.

**7.2** For all G-B I.S.R. registered vessels any documents used as disaggregated data for the gathering of fuel consumption information should be retained either on board the ship or with the Company for not less than 12 months after the end of the respective calendar year. Such documents shall be made available to the G-B I.S.R. and/or Recognized Organization that classes the ship upon request.

## 8. Reporting of Fuel Consumption Data

**8.1** For all G-B I.S.R. operated vessels 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. It is noted that the competent services of the IMO will preserve reported data in such a way as to preclude the identification of any individual ship for which the data had been submitted.

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

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<sup>1</sup> Recognized Organizations Authorized and Delegated to Perform Statutory Certifications and Services for Ships Registered in the International Ships Registry of Guinea Bissau (G-B I.S.R.): [Marine Notice Nr. 02/2022 rev.04 – 24/08/2022](https://gbisr.com/marine-notice/) (<https://gbisr.com/marine-notice/>)



- .1 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;
- .2 Every type of fuel oil consumed on board for any purpose (engines, boilers, incinerators, inert gas generators, heaters, etc.), in metric tonnes. This requirement also applies to ships consuming boil-off gas (BOG) for the purpose of propulsion or shipboard operational needs;
- .3 distance traveled over the ground;
- .4 hours underway;
- .5 information on the method used to collect fuel consumption data as required by MARPOL Annex VI.

**8.3** When the Reporting Organization/Verifier has received fuel consumption data from a ship and verified that it has been collected and reported correctly per the guidelines of MEPC.348(78), 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.

**8.4** 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.

**8.5** For all G-B I.S.R. registered vessels the submitted fuel consumption data shall be verified by the Reporting Organization/Verifier for consistency and accuracy as required through Regulation 27 of MARPOL Annex VI. In this respect IMO has developed a set of guidelines aiming to facilitate such verification which can be found in Resolution MEPC.348(78). The method of fuel consumption data verification and any additional documents that may need to be provided to the Reporting Organization/Verifier along with the annual fuel consumption data collection report shall be clearly addressed in the SEEMP.

## **9. Energy Efficiency Existing Ships Index (EEXI) – Key Dates**

**9.1** G-B I.S.R. vessels of 400 GT and above will have to demonstrate compliance by the annual, intermediate, or renewal IAPP survey whichever comes first on or after 1 January 2023, by having an approved EEXI Technical File and the revised International Energy Efficiency (IEE) Certificate.

**9.2** As of 1st January 2023 an EEXI technical file should be issued for vessels that satisfy the required EEXI. The attained EEXI will need to be verified and meet the required EEXI via the application for a survey and the submission of an EEXI technical file to a class society of the vessel which issued statutory certificates on behalf of the G-B I.S.R. Compliance with EEXI should be demonstrated with a ship's International Energy Efficiency Certificate (IEEC) issued also by the classification society of the vessel. Technical files will need to be readily available onboard for inspection.

## **10. Carbon Intensity Indicator (CII)**

**10.1** The Carbon Intensity Indicator (CII) is an operational measure and will be applicable to a certain type of G-B I.S.R. ships of 5000 GT and above, as per Annex VI of the MARPOL. Based on the annual data collected, the attained annual operational CII will have to be calculated, documented, and verified against the required annual operational CII to determine operational carbon intensity ratings ranging from A to E.



**10.2** The SEEMP will need to be amended, reviewed, and verified, on or before 1 January 2023, by the classification society of the vessel or other Recognized Organization (RO) that is responsible for DCS and verification of SEEMP Part II. The G-B I.S.R. ships subject to the CII rating are required to develop a SEEMP Part III to include: "CII calculation methodology", "Required CII values over the next 3 years", "implementation plan for achieving the required CII" and "procedures for self-evaluation and improvement", which should be confirmed by the classification society of the vessel or RO.

**10.3** For the SEEMP III, a Confirmation of Compliance (CoC) should be issued upon verification by the classification society of the vessel or RO latest by 1 January 2023.

**10.4** The CII and rating follow the existing DCS verification cycle, and both will be noted on the Statement of Compliance (SoC) issued annually by the classification society of the vessel or RO confirming the verification of the DCS data for the previous calendar year ("Statement of Compliance – Fuel Oil Consumption Reporting and Operational Carbon Intensity Rating"). This SoC should be issued by the classification society of the vessel or RO latest by 31 May 2024 and thereafter every subsequent year.

## 11. EU MRV Reporting

**11.1** Submission of data pursuant to Regulation (EU) 2015/7576<sup>2</sup> stipulating the EU 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. Where a Recognized Organization by the G-B I.S.R. that is acting as a Reporting Organization/Verifier (DCS) has been accredited as an MRV verifier, the G-B I.S.R. has no objection to fuel consumption data and MRV reporting being combined, provided that the combined reports provide all of the information required by MARPOL Annex VI.

## 12. UK MRV Reporting

**12.1** As a result of the United Kingdom has left the EU, the EU MRV no longer applies to the UK. However, the UK has adopted MRV regulations based on the EU MRV<sup>3</sup>. Collection of fuel consumption data pursuant to UK MRV requirements applies to all ships trading in or out of any UK ports since 01 January 2022 with the first submission to be effected by 30 April 2023.

**12.2** All G-B I.S.R. Recognized Organizations acting as Reporting Organization/Verifier (DCS) are invited to provide a similar level of service in respect of UK MRV as currently being provided to cover EU MRV data collection, verification, and issuance of Document of Compliance.

## 13. Required Follow-up Action

**13.1** Companies managing G-B I.S.R. registered vessels & ISM Managers are required to take necessary actions in order to comply in general with MARPOL Annex VI requirements and in particular with the new EEXI and CII regulations, within the respective time frame mentioned above.

## 14. Effective Date

**14.1** The current Maritime Circular has immediate effect as per the day of issuance.

<sup>2</sup> (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015R0757>)

<sup>3</sup> (UK Marine Information Notice MIN669(M+F).



# G-B INTERNATIONAL

INTERNATIONAL SHIPS REGISTRY OF GUINEA-BISSAU

## 15. Enquiries

15.1 Any enquiries relating to this Marine Circular may be addressed to the G-B I.S.R. – Technical Department (E-Mail: [tech@gbi-lb.org](mailto:tech@gbi-lb.org), Tel. : +30 210 4537950, +30 210 4537194).

## For the Guinea-Bissau International Ships Registry

Authorized Signatory:  
Office of the General Ships Registrar



Attached:  
MEPC.328(76)

## Revision Status

Date of Issue	Revision No.	Amendments
08/12/2022	00	Initial adoption