

Palau International Ship Registry



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MARINE CIRCULAR 145.3

To: ALL SHIPOWNERS, MANAGERS, MASTERS, AND REGISTRATION OFFICERS OF MERCHANT SHIPS AND RECOGNIZED ORGANIZATIONS.

Subject: FUEL OIL CONSUMPTION DATA COLLECTION AND REPORTING AND CARBON INTENSITY INDICATOR

1. REFERENCES

- 1.1 Resolution MEPC.278(70) Amendments to MARPOL Annex VI (Data Collection system for fuel oil consumption of ships).
- 1.2 Resolution MEPC.282(70) 2016 Guidelines of the development of a ship energy efficiency management plan (SEEMP).
- 1.3 Resolution MEPC.346(78), which revokes the Resolution MEPC.282(70)
- 1.4 MEPC.1/Circ.876 Sample format for the Confirmation of Compliance, early submission of the SEEMP Part II on the ship fuel oil consumption data collection plan and its timely verification pursuant to regulation 5.4.5 of MARPOL Annex VI.
- 1.5 Resolution MEPC. 293(71) 2017 Guidelines for Administration Verification of Ship Fuel Oil Consumption Data and MEPC.293(71)
- 1.6 Resolution MEPC. 328(76) - 2021 Revised MARPOL Annex VI, dated June 17, 2021.
- 1.7 Resolution MEPC. 352(78)- 2022 Guidelines on Operational Carbon Intensity Indicators and the Calculation Methods (CII Guidelines, G1) dated June 10, 2022.
- 1.8 Resolution MEPC.347(78) DATED 10 June 2022 – Guidelines for the verification and Company Audits by the Administration of Part III of the SEEMP.

2. PURPOSE

- 2.1 This Marine Circular provides information and guidance to Shipowners and Managers operating Palau registered vessels, regarding the IMO Data Collection System for Fuel Oil Consumption (DSC) in accordance with Regulation 22A of MARPOL Annex VI as amended.



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2.2 Furthermore, to provide guidance and instructions to ensure the correct implementation of the IMO Data Collection System (DCS) and the Operational Carbon Intensity (CII).

3. APPLICATION

3.1 This Marine Circular applies to all Palau registered vessels of 5000 gross tonnage and above except for:

- Vessels not propelled by mechanical means,
- Platforms including Floating Production, storage and Offloading Facilities (FPSOs), Floating Storage Units (FSUs), and Drilling rigs regardless of their propulsion.

3.2 The provisions of this Circular may be voluntarily adopted for ships of less than 5000 GRT.

3.3 Fuel consumption data collection is mandatory for the ships referred to in paragraph 2.1 from January 1st 2019.

3.4 SEEMP shall be amended or reviewed in order to include the methodology and details required by Regulation 28 of MARPOL Annex VI.

4. BACKGROUND

4.1 From January 1st, 2019, all ships to which this Marine Circular applies shall comply with Regulation 22A of MARPOL Annex VI. This requires the compilation and reporting of fuel consumption, hours of operation and distance travelled for each calendar year.

5. SHIP OWNERS AND OPERATORS

5.1 Following the end of each calendar year, but not later than March 31st of the subsequent year, the Owners/Managers shall submit a report of fuel consumption data covering the previous year to the Recognized Organization of the ship, or to the duly authorized by the Administrator Verifier. The first fuel consumption data report shall therefore be submitted not later than March 31st, 2020.

5.2 The report shall include the aggregated value for each datum specified in appendix IX of Annex VI, via electronic communication using the format specified in appendix 3 of Resolution MEPC.282(70).



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5.3 Owners and managers shall review the SEEMPs, especially in cases of ships of 5000 GT and above to include the SEEMP Part III, considering the adoption of the guidelines by the Organization (Refer to Resolution MEPC.346(78)).

6. FUEL CONSUMPTION

6.1 Palau Ship Registry Administrator has authorized specific Recognized Organizations and Independent Verifiers to collect and verify fuel consumption data from Palauan ships, and to report to IMO in accordance with the provisions of Regulation 22A of MARPOL Annex VI.

6.2 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 document shall be made available to the Palau Ship Registry Administrator upon request.

6.3 Updated list of authorized Recognized Organizations and verifiers can be provided by contacting Palau International Ship Registry HO.

7. OPERATIONAL CARBON INTENSITY

7.1 At the end of the calendar year 2023 and after the end of subsequent calendar years, each ship of 5000 GT and above falling into categories in Regulations 2.2.5, 2.2.7, 2.2.9, 2.2.11, 2.2.14 to 2.2.16, 2.2.22 in Annex VI, shall calculate their Attained Annual Operational Carbon Intensity Indicator (Attained CII) from January 1 to December 31, using the data collected as per the Regulation 27 of Annex VI. Comparing it with the Required Annual Operational Carbon Intensity Indicator (Required CII) to determine operational carbon intensity rating A, B, C, D, or E.

7.2 Ships that fall shall report within three (3) months after the end of each calendar year the Attained Annual Operational CII to the Recognized Organization or Verifier duly authorized by this Administration according to MARPOL Annex VI Regulation 28.2 via electronic communication using the format specified in Appendix 3 of the 2022 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP) adopted by the IMO through Resolution MEPC.346(78) dated June 10, 2022.



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8. DATA REPORTING AND VERIFICATION

- 8.1 Within three (3) months after the end of each calendar year, aggregated values for each data specified in Appendix IX to MARPOL Annex VI must be reported to the Recognized Organization or verifiers, electronically, following the reporting process specified in Part II of the SEEMP.
- 8.2 All data reported as per section 7.1 shall be verified by the Recognized Organization or verifiers as required by Regulation 22A.7, taking into account IMO Resolution MEPC.293(71), 2017 "Guidelines for Administration verification of ship fuel oil consumption data".
- 8.3 The verification of data reported in accordance with section 7.1 and 7.2, shall be completed no later than five (5) months after the end of the previous calendar year.
- 8.4 A Statement of Compliance (SOC), corresponding to the form provided under Appendix X of MARPOL Annex VI, must be issued after successful completion of the relevant verification of the data.
- 8.5 The Statement of Compliance shall be valid for the calendar year in which it is issued and for the first 5 months of the following calendar year.

9. RECOGNIZED ORGANIZATIONS AUTHORIZED BY THE PALAU SHIP REGISTRY ADMINISTRATOR

- 9.1 Recognized Organizations already authorized by the Palau Ship Registry Administrator shall provide the following services to Palauan flagged vessels:
- 9.1.1 Confirm that every vessel of 5000 GT and above keeps on board a Ship Energy Efficiency Management Plan as required by Regulation 22A of Annex VI of MARPOL 73/78. For vessels of 5000 GT and above keeps on board a Ship Energy Efficiency Management Plan (including SEEMP Part III) as required by MARPOL Annex VI Regulation 26.3.
- 9.1.2 Confirm compliance of the vessel with the Ship Energy Efficiency Plan.
- 9.1.3 Issue a "Confirmation of Compliance" this "Confirmation of Compliance" must be retained on board the ship.



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- 9.1.4 Verify and determine if the data reported by ships of 5,000 gross tonnage and above has been collected and complies with Regulation 27 of Annex VI of MARPOL 73/78.
- 9.1.5 Verify that the Attained Annual Operational CII reported (Regulation 28.1) is based on the fuel oil consumption data reported, as per MARPOL Annex VI Regulation 27.
- 9.1.6 Determined the operational carbon intensity rating according to MARPOL Annex VI Regulation 28.6.
- 9.1.7 Issue a "Statement of Compliance" in accordance with Regulation 6.6 and 6.7 of Annex VI of MARPOL 73/78.
- 9.1.8 Submit to the International Maritime Organization the reported data noted in appendix IX, Annex VI, of MARPOL 73/78, using the IMO Ship Fuel Oil Consumption Database.

9.2 All Recognized Organizations that receive the data collected by Palauan flagged ships of 5000 GRT or more must submit a consolidated report of this data to the Palau Ship Registry Administrator no later than five (5) months after the end of the previous calendar year.

10. INDEPENDENT COMPANIES AUTHORIZED BY THE PALAU SHIP REGISTRY ADMINISTRATOR

10.1 Independent companies authorized by the Palau Ship Registry Administrator, shall provide the following services to Palauan flagged vessels:

- 10.1.1 Confirm that every vessel of 5000 gross tonnage and above keeps on board a Ship Energy Efficiency Plan as required by Regulation 22A of Annex VI of MARPOL 73/78. For vessels of 5000 GT and above keeps on board a Ship Energy Efficiency Management Plan (including SEEMP Part III) as required by MARPOL Annex VI Regulation 26.3.
- 10.1.2 Send a notification to the Palau Ship Registry Administrator stating the compliance of the vessel with the Ship Energy Efficiency Plan as mentioned in 9.1.1.
- 10.1.3 After receiving this notification, the Palau Ship Registry Administrator will issue a "Confirmation of Compliance".



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- 10.1.4 Verify and determine if the data reported by ships of 5,000 gross tonnage and above has been in accordance with Regulation 22A of Annex VI of MARPOL 73/78.
 - 10.1.5 Verify that the Attained Annual Operational CII reported (Regulation 28.1) is based on the fuel oil consumption data reported, as per MARPOL Annex VI Regulation 27
 - 10.1.6 Determined the operational carbon intensity rating according to MARPOL Annex VI Regulation 28.6
 - 10.1.7 Issue a recommendation to the Palau Ship Registry Administrator indicating if the ship can be issued with a “Statement of Compliance” by the Palau Ship Registry Administrator.
 - 10.1.8 Submit to the Palau Ship Registry Administrator a consolidated report of the data collected regarding fuel oil consumption of ships of 5000 gross tonnage and above.
- 10.2 After receiving the recommendation specified in paragraph 9.1.5, the Palau Ship Registry Administrator will proceed with the issuance of a “Statement of Compliance – SEEMP Part III”.
- 10.3 All Independent Companies that receive the data collected by Palauan flagged ships of 5000 GRT or more must submit a consolidated report of this data to the Palau Ship Registry Administrator no later than five (5) months after the end of the previous calendar year.

11. CHANGE OF FLAG AND/OR OWNERS/MANAGERS

- 11.1 In the event of a transfer of Flag, the ship, on the day of the completion of the transfer, or as close as possible, shall report to the losing Flag Administration through its Recognized Organization or Independent Verifier the aggregated data for the period of the calendar year corresponding to that Flag Administration, as specified in Appendix IX of Annex VI and, upon prior request of the new Flag Administration, the disaggregated data.
- 11.2 In the event of a change of owners/managers, the ship, on the day of completion of the change or as close as possible, shall report to the Palau Ship Registry Administrator through its Recognized Organization or authorized verifier, the



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aggregate data for the period of the calendar year corresponding to the existing managers/owners, as specified in Appendix IX of Annex VI and, upon prior request of PISR, the disaggregated data.

11.3 Furthermore, in the event of transfer of Flag and owners/managers concurrently, the ship, on the day of the completion of the transfer, or as close as possible, shall report to the losing Flag Administration through its Recognized Organization or Independent Verifier, the aggregated data for the period of the calendar year corresponding to that Flag Administration, as specified in Appendix IX of Annex VI and, upon prior request of the new Flag Administration, the disaggregated data.

12. FEES

12.1 The Palau Ship Registry Administrator will charge 280.00 for the issuance of the SEEMP Part III COC and the SOC for the Data reporting and verification.

13. CONTACT

For further information please contact Palau Ship Registry Administrator at technical@palaureg.com

This Marine Circular supersedes the Marine Circular 145.2

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