



Technical Circular

No.: 019/2021

Date: 20th April 2021

Subject: Cyprus Maritime Administration Circular No. 18/2021 Reg deadline for submission of emission data required by IMO-DCS Regulation and EU-MRV Regulation.

1. The maritime Administration of Cyprus has issued Circular No.18/2021, dated 13th April 2021 providing information to assist ship owners/ managers meet the deadline for submission of emission data as required by MARPOL Annex VI / Regulation 22A – the ‘IMO-DCS Regulation’ and by the ‘EU-MRV Regulation’.
2. The deadline for the submission of aggregated data as per the IMO- DCS Regulation by a company (company means the owner/manager/bareboat charterer or other person or entity responsible for the operation of a ship) for ships under their management, is within three (3) months after the end of each calendar year, namely the 31st March of each year, for the previous year. The “Statement of Compliance – Fuel Oil Consumption Reporting” for the reporting period is to be issued two (2) months at the latest after the submission, i.e. by 31st May of each calendar year.

Accordingly, it is recommended that the aggregated data are submitted as early as possible after the ending of the reporting period, so that the data verification, the issuance of the “Statement of Compliance” and the submission thereof to the IMO’s database before the deadline of 31st May of each calendar year can be completed in time.

3. The deadline for the submission of the annual emissions data as per the EU-MRV Regulation by a company (company means the owner/manager/bareboat charterer or other person or entity responsible for the operation of a ship) for ships under their management for the previous year is the 30th April of each calendar year. The “Document of Compliance” is to be issued by the 30th June the latest.

Accordingly, it is recommended that the emissions data are submitted as early as possible after the ending of the reporting period, in order to allow the verifier sufficient time to check of the data and to issue the “Document of Compliance” before the deadline of 30th of June, of each calendar year.

4. Following is to be noted in order to comply with the requirements of the IMO-DCS Regulation:

- IRCLASS**
- . This Technical Circular and the material contained in it is provided only for the purpose of supplying current information to the reader and not as an advice to be relied upon by any person.
 - . While we have taken utmost care to be as factual as possible, readers/ users are advised to verify the exact text and content of the Regulation from the original source/ issuing Authority.

- a. **In case of change of flag of the ship:** In the event of transfer of a ship from one Administration to another, the ship shall on the day of completion of the transfer or as close as practical thereto, shall report to the losing Administration or any Recognised Organizations (RO), the aggregated data for the period of the calendar year corresponding to that Administration, as specified in appendix IX to MARPOL Annex VI.
 - b. **In case of transfer of a ship from one management company to another:** In the event of a change from one Company to another, the ship shall on the day of completion of the change or as close as practical thereto, report to its Administration or any Recognised Organizations (RO), the aggregated data for the portion of the calendar year corresponding to the Company.
 - c. In the event of change from one Administration to another and from one Company to another concurrently, above paragraphs 'a' and 'b' shall also apply.
5. In addition to the above the following is to be noted for the purposes of compliance with the requirements of the EU-MRV Regulation:
- a. Where there is a change of a Company, the new company is to ensure that each ship under its responsibility complies with the requirements of this Regulation in relation to the entire reporting period during which it takes responsibility for the ship concerned. **Therefore, the Company responsible for the ship on 31st of December is the one taking over the reporting responsibilities to compile year aggregated data for the entire reporting period, including the activities carried out while a ship was under the management of a previous Company.**
 - b. By the 30th June of the year following the end of the reporting period, ships arriving at, within or departing from a port under the jurisdiction of a EU Member State, and which have carried out voyages during that reporting period, are required to carry on board a valid Document of Compliance demonstrating the submission of the required data, as per Art. 18 of the EU-MRV Regulation.
6. Further, the Administration has informed that there were several omissions which were reported by IMO and EU during the evaluation of data submitted for the year 2019, as follows:
- a. When a ship changed owner and or manager, there was a failure of submission by the previous owner and/or manager of emissions data and other information required by Regulation for their period of the ownership / management, enabling the new owner and/ or manager to proceed with the submission to the RO or Verifier, and that the new owner/manager failed to request/ensure that the data are submitted to them.

- b. There was a delay for the submission of reports to either the MRV verifier or the RO, as the case was applicable, thus resulting to delayed verification and issuance of the Document of Compliance /Statement of Compliance.
 - c. There was a high percentage or erroneous submissions which resulted to re-submission after amendments, and delay on the verification process and the issuance of the Document of Compliance /Statement of Compliance.
 - d. There was several cases when the ship's type was reported to be different than the type of ships as listed in MARPOL Annex VI/Reg. 2, which resulted to the rejection of the submitted reports.
7. Ship owners/ operators and masters of Cyprus flagged ships are advised to be guided by above and ensure compliance.

Enclosure:

1. Cyprus Maritime Circular No. 18/2021, dated 13/04/2021.

Whilst the utmost care has been taken in the compilation of the Technical Information, neither Indian Register of Shipping, its affiliates and subsidiaries if any, nor any of its directors, officers, employees or agents assume any responsibility and shall not be liable to any person for any loss, damage or expense caused in any manner whatsoever by reliance on the information in this document.



REPUBLIC OF CYPRUS

SHIPPING DEPUTY MINISTRY TO THE PRESIDENT

Circular No 18/2021

13 April 2021

SDM 5.13.09

To all Registered owners, Registered bareboat charterers
Managers and Representatives of ships flying the Cyprus Flag

To all Recognised Organisations (ROs)
Legal Entities accredited to carry out verification duties pursuant to Reg. (EU)2015/757

Subject: 1. Annex VI, Reg.22A MARPOL - Data Collection System for fuel oil Consumption of Ship.
2. REGULATION (EU) 2015/757 monitoring, reporting and verification of carbon dioxide emissions from maritime transport.

The Shipping Deputy Ministry wishes to draw your attention, to the requirements of **MARPOL Annex VI / Regulation 22A, “Collection and reporting of ship fuel consumption data”** (the IMO - DCS Regulation) and of **“Reg. (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport”** (the EU-MRV Regulation) as well as to inform you about the deadlines for the submission of emission data and the issuance of the Statement of Compliance, as well as for the requirements in case of change of flag/company. For the submission of data according to the EU – MRV Regulation, DMS Circular No. 15/2017 is of relevance.

2. The deadline for the submission of aggregated data as per the IMO- DCS Regulation by a company (company means the owner/manager/bareboat charterer or other person or entity responsible for the operation of a ship) for ships under their management, to a selected Recognised Organisations (RO) is within three (3) months after the end of each calendar year, namely the **31st of March of each year, for the previous year**. The “Statement of Compliance – Fuel Oil Consumption Reporting” for the reporting period must be issued two (2) months at the latest after the submission, i.e. **by 31st of May** each calendar year.

It is therefore recommended that the aggregated data are submitted as early as possible after the ending of the reporting period, to allow the RO sufficient time for the data verification, the issuance of the “Statement of Compliance” and the submission thereof to the IMO’s database before the deadline of 31st of May of each calendar year.



3. The deadline for the submission of the annual emissions data as per the EU-MRV Regulation by a company (company means the owner/manager/bareboat charterer or other person or entity responsible for the operation of a ship) for ships under their management for the previous year to the selected verifier is the **30th of April of each calendar year**. The “Document of Compliance” should be issued by the **30th of June the latest**.

It is therefore recommended that the emissions data are submitted as early as possible after the ending of the reporting period, in order to allow the verifier sufficient time to check of the data and to issue the “Document of Compliance” before the deadline of 30th of June, of each calendar year.

4. Moreover, the following should be noted in order to comply with the requirements of the IMO-DCS Regulation:

4.1 In case of change of flag of the ship, Par.4 of MARPOL/ANNEX VI/Reg.22A/ provides as follows:

“in the event of **transfer of a ship from one Administration to another**, the ship shall on the day of completion of the transfer or as close as practical thereto shall report to the losing Administration or any Recognised Organizations (RO), the aggregated data **for the period of the calendar year corresponding to that Administration**, as specified in appendix IX to this Annex”;

4.2 In case of transfer of a ship from one management company to another the guidance given in Par.5 of MARPOL/ANNEX VI/Reg.22A/ provides as follows:

“In the event of a **change from one Company to another**, the ship shall on the day of completion of the change or as close as practical thereto report to its Administration or any Recognised Organizations (RO), the **aggregated data for the portion of the calendar year corresponding to the Company**”;

4.3 In the event of change from one Administration to another and from one Company to another concurrently, paragraphs 4.1 and 4.2 shall also apply.

5. In addition to the above the following should be noted for the purposes of compliance with the requirements of the EU-MRV Regulation:

5.1 The EU-MRV Regulation applies only to ships above 5000 gross tonnage, in respect of CO₂ (Carbon Dioxide) emissions for voyages from their last port of call to a port of call under the jurisdiction of a Member State and from a port of call under the jurisdiction of a Member State to their next port of call, as well as within ports of call under the jurisdiction of a Member State, when this call serves the purpose of transporting passengers or cargo for commercial purposes;

5.2 Where there is a change of a Company, the new company shall ensure that each ship under its responsibility complies with the requirements of this Regulation in relation to **the entire reporting period during which it takes responsibility for the ship**

concerned. Therefore, the Company responsible for the ship on 31st of December is the one taking over the reporting responsibilities to compile year aggregated data for the entire reporting period, including the activities carried out while a ship was under the management of a previous Company.

5.3 By the 30th June of the year following the end of the reporting period, ships arriving at, within or departing from a port under the jurisdiction of a Member State, and which have carried out voyages during that reporting period, shall carry on board a valid Document of Compliance demonstrating the submission of the required data, as per Art. 18 of the EU-MRV Regulation.

6. During the evaluation of data submitted for the year 2019, it was noted that there were several omissions which were reported by IMO and EU, as follows:


6.1 When a ship changed owner and or manager, there was a failure of submission by the previous owner and/or manager of emissions data and other information required by Regulation for their period of the ownership / management, enabling the new owner and/ or manager to proceed with the submission to the RO or Verifier, and that the new owner/manager failed to request/ensure that the data are submitted to them.

6.2 There was a delay for the submission of reports to either the MRV verifier or the RO, as the case was applicable, thus resulting to delayed verification and issuance of the Document of Compliance /Statement of Compliance.

6.3 There was a high percentage or erroneous submissions which resulted to re-submission after amendments, and delay on the verification process and the issuance of the Document of Compliance /Statement of Compliance.

6.4 There was several cases when the ship's type was reported to be different than the type of ships as listed in MARPOL Annex VI/Reg. 2, which resulted to the rejection of the submitted reports.

7. The above information is aiming to assist the submissions. For further clarifications or guidance in relation to the matters covered by this Circular, please contact the Marine Environment Unit of the Flag State Directorate of the Shipping Deputy Ministry of Cyprus at environment@dms.gov.cy.



Neophytos Papadopoulos
Permanent Secretary
Shipping Deputy Ministry

- Attorney General of the Republic
- Permanent Secretary, Ministry of Foreign Affairs
- Permanent Secretary, Ministry of Transport, Communications and Works
- Diplomatic Missions and Honorary Consular Officers of the Republic
- Maritime Offices of the Shipping Deputy Ministry to the President abroad
- General Manager, Cyprus Ports Authority
- Director, Department of Environment
- Director, Department of Fisheries and Marine Research
- Cyprus Shipping Chamber
- Cyprus Union of Shipowners
- Cyprus Shipping Association
- Cyprus Bar Association