



GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
(PORTS & SHIPPING WING)

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Karachi, the 07th Dec, 2021

CIRCULAR NO. 04 /2021

Subject: Application of IMO Resolution MEPC.328 (76) to Pakistani Ships - Amendments to chapter 4 of MARPOL Annex VI (2021 revised MARPOL Annex VI).

Fuel Consumption Data and Recording

Notice to ship owners, managers, Masters, Recognised Organisations and Mercantile Marine Department (MMD) surveyors.

1. Purpose.

- 1.1. This Marine Notice is intended to provide instructions and guidance to Companies operating Pakistani ships on fuel consumption data reporting, as required under Regulation 22A of Annex VI of the International Convention for the Prevention of Pollution from Ships 1973, as amended (MARPOL Annex VI).
- 1.2. This Notice should be read in conjunction with Regulations 22 & 22A and Appendices IX & X of MARPOL Annex VI, and International Maritime Organization (IMO) Resolutions MEPC.282(70)2, MEPC.292(71)3, MEPC.293(71)4 and Circular MEPC.1/Circ.876.

2. Application:

- 2.1. This Notice applies to all ships of 5,000 gross tonnage and above with the exception of:
 - i. ships not propelled by mechanical means;
 - ii. offshore platforms, including FPSOs, FSUs and drilling rigs, regardless of their propulsion;
 - iii. ships operating exclusively in Pakistani waters, provided that such ships are constructed and act in a manner consistent with Chapter 4 of MARPOL Annex VI so far as is reasonable and practicable.
- 2.2. Fuel consumption data collection requirements also apply to ships that may have joined or left the Pakistan Flag during the calendar year for which a partial annual submission is required.

2.3. In situations where a ship is under repair or conversion, or in extended lay-up, or remains otherwise out of active operations during the entire year, the requirements of this Notice apply should the ship have consumed and/or bunkered any quantity of fuel during the year.

2.4. The provisions of this Notice may be voluntarily adopted for ships of less than 5,000 gross tonnage.

3. **Fuel consumption data submission timeline:**

3.1. The Company shall ensure that fuel consumption data for the previous year for ships to which Regulation 22A of MARPOL Annex VI applies is submitted to the Reporting Organisation/Verifier by not later than 31 March. The Statement of Compliance required by Regulation 6.6 of MARPOL Annex VI is to be issued by the Reporting Organisation/Verifier by 31 May each year.

3.2. Verified fuel consumption data is to be uploaded to the IMO Global Integrated Shipping Information System (GISIS) by the Reporting Organisation/Verifier within 1 month after issuing the Statement of Compliance but not later than 30 June.

3.3. When preparing the annual fuel consumption reports for their fleet, the 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 Pakistani Flag, or has been recycled before 31 December. 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 as close as practical thereto.

3.4. Recognising that on occasions timely submission or review of aggregated and verified data cannot be completed, the Flag Administration exercises a pragmatic approach in allowing the Reporting Organisation/Verifier additional time to complete the submission and issue a Statement of Compliance. A request for a conditionally issued short term International Energy Efficiency (IEE) Certificate should be submitted via the Classification Society by the Company for every ship where any of the limit date(s) in paragraph 3.1 cannot be met. The Flag Administration will consider such requests on a case-by-case basis.

4. **SEEMP and Fuel Consumption Data Collection Methodology.**

4.1. In order to fulfil the required reporting provisions, all ships to which this Notice applies 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 Plan (SEEMP), especially in Part II of the SEEMP' Ship Fuel Oil Consumption Data Collection Plan.

- 4.2. The SEEMP should be verified by the nominated Reporting Organisation/Verifier, prior to commencement of fuel consumption data reporting. On successful verification of the amended SEEMP, the Reporting Organisation/Verifier is to issue a Confirmation of Compliance to the ship in accordance with Regulation 5.4.5 of MARPOL Annex VI.
- 4.3. Where there is a change of nominated Reporting Organisation/Verifier, the new Reporting Organisation/Verifier shall obtain the SEEMP Part II verified by the previous Recognised Organisation/Verifier and the related Confirmation of Compliance and take those to their files as a basis for later verifications.
- 4.4. Part I and II of the SEEMP and Confirmation of Compliance shall be kept on board.

5. Reporting Organisations / Verifiers.

- 5.1. The Administration has authorised its existing Recognised Organisations to act as Reporting Organisations/Verifiers in order to collect, and verify fuel consumption data from Pakistani Flag ships, and to report to IMO in accordance with the provisions of Regulation 22A of MARPOL Annex VI.
- 5.2. The Reporting Organisation/Verifier does not need to be the Recognised Organisation that classes the ship, though this may streamline the fuel consumption data collection and submission process, including data verification.
- 5.3. Any documents used as disaggregated data for 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 Administration and/or Recognised Organisation that classes the ship upon request.

6. Reporting of Fuel Consumption Data.

- 6.1. 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.
- 6.2. In accordance with Appendix IX of MARPOL Annex VI, the following information is to be included in the annual cumulative fuel consumption data report:
 - 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 consumed on board for any purpose (engines, boilers, incinerator, 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;
 - iii. distance travelled over ground;

- iv. hours underway;
 - v. information on the method used to collect fuel consumption data as required by Regulation 22A of MARPOL Annex VI.
- 6.3. The Administration considers methods of collection of fuel consumption data to be acceptable where based on one or more of the following:
- i. Fuel quantities bunkered, as taken from Bunker Delivery Note (BDN) or in absence of BDN taken from Code H entries in the Oil Record Book Part I; or
 - ii. Fuel bunker tank(s) sounding records; or
 - iii. Fuel flow meter readings. (Where fuel flow meter data is used, a backup method must be described in SEEMP Part II for utilisation in case of fuel meter malfunction. The Administration recommends that the accuracy of fuel meters is verified by authorized technician on an annual basis).
- 6.4. Reporting of direct CO₂ emission measurements is not mandatory. This method may however be utilised concurrently where the necessary equipment is installed on board to supplement the fuel consumption data report.
- 6.5. When the Reporting Organisation/Verifier has received fuel consumption data from a ship and verified that it has been collected and reported correctly per the guidelines of MEPC.292(71), 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.
- 6.6. 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.
- 6.7. 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.
- 6.8. 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.
- 6.9. Submitted fuel consumption data shall be verified by the Reporting Organisation/Verifier for consistency and accuracy as required through Regulation 22A.7 of MARPOL Annex VI. IMO has developed a set of guidelines aiming to facilitate such verification which can be found in Resolution MEPC.292(71).
- 6.10. The method of fuel consumption data verification and any additional documents that may need to be provided to the Reporting Organisation/Verifier 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 6.3 above but should not be the same method used for the annual fuel consumption data collection.

7. Measures to Improve Efficiency.

- 7.1. 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. The Administration welcomes any innovative solution aimed at improving fuel consumption efficiency.

This is issued with the approval of the Director General Ports & Shipping, Ministry of Maritime Affairs, Government of Pakistan.



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