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To,
OWNERS / MANAGERS, DEPUTY COMMISSIONERS,
CLASSIFICATION SOCIETIES / RECOGNIZED ORGANIZATIONS

SUBJET: COLLECTION AND REPORTING REQUIREMENTS FOR THE SHIP FUEL OIL
CONSUMPTION DATA

REFERENCE: MARPOL ANNEX VI
RESOLUTION MEPC.282(70)
RESOLUTION MEPC.278(70)
RESOLUTION MEPC.292(71)
RESOLUTION MEPC.293(71)

1. Purpose

- 1.1. The purpose of this Circular is to inform all interested parties about the implementation of the requirements of MARPOL Annex VI / Regulation 22A, for the Collection and Reporting of Ship Fuel Oil Consumption Data and provide instructions to Owners/Managers, Deputy Commissioners, Classification Societies/Recognized Organizations for a smooth transition towards the implementation.

2. Application

- 2.1. The amendment to MARPOL Annex VI entered into force on 1st March 2018. The data collection system for fuel consumption is applicable from 1st January 2019 for ships of 5000GT and above.
- 2.2. Until December 31st 2018, all Comorian Flagged vessels of 5,000GT and above, to which MARPOL Annex VI, Chapter 4 applies shall have a Ship Energy Efficiency Management Plan (SEEMP)¹, which shall include the data collection and reporting methodology, verified by an authorized Recognized Organization (RO). The authorized RO shall ensure compliance of the vessel's SEEMP Part II with MARPOL Annex VI. Upon successful verification, the authorized RO shall issue a Confirmation of Compliance – SEEMP Part II to the ship, in accordance with MARPOL Annex VI, Reg. 5.4.5. The authorized ROs shall submit to the Administration, no later than 31 December 2018 a copy of the issued Confirmation of Compliance SEEMP Part II.

¹ For Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP), refer to Resolution MEPC.282(70).



3. Procedure

3.1 As of January 1st 2019, all Comorian Flagged vessels of 5,000GT and above shall collect the data according to the methodology included in the Part II of the SEEMP. The total value of above data for each calendar year will have to be reported within three months after the end of each calendar year, to the Recognized Organization. Upon receipt of reported data, the RO will verify - following the end of each calendar year, but not later than May 31st of the subsequent year - that it is in compliance with regulation 22A and issue a Annual Statement of Compliance – Fuel Oil Consumption (ref.: MARPOL Annex VI, Appendix X) and report to the designated IMO GISIS tool “Ship Fuel Oil Consumption”. The reported data shall be in accordance with MARPOL Annex VI, Appendix IX. The verification of ship fuel oil consumption data shall be done in accordance to Resolution MEPC.292(71).

3.2 Recognized Organizations authorized to carry out verification and reporting of fuel consumption data, approval of SEEMP part II and issuance of the statement(s) of compliance are:

- 3.2.1 American Bureau of Shipping (ABS)
- 3.2.2 Bulgarian Register of Shipping (BRS)
- 3.2.3 Bureau Veritas (BV)
- 3.2.4 Dromon Bureau of Shipping (DBS)
- 3.2.5 International Naval Surveys Bureau (INSB)
- 3.2.6 Nippon Kaiji Kyokai (NK)
- 3.2.7 Phoenix Register of Shipping (PHRS)
- 3.2.8 Polski Rejestr Statkow (PRS)
- 3.2.9 RINA Services S.p.A. (RINA)
- 3.2.10 Russian Maritime Register of Shipping (RMRS)
- 3.2.11 Veritas Register of Shipping (VRS)

3.3 Should any of the Authorized Recognized Organizations mentioned in circular 17/698/COM of 26 January 2018 like to be authorized to carry out verification and reporting of fuel consumption data, approval of SEEMP part II and issuance of the statement(s) of compliance shall submit to this Administration the following items:



- 3.3.1 Procedures for the implementation of MARPOL Annex VI, Approval of SEEMP, verification and reporting of ship oil fuel consumption data and issuance of statements of compliance;
 - 3.3.2 Qualifications of personnel who will be authorized to carry out the above tasks;
 - 3.3.3 Any other document developed by the Recognized Organization related to the collection and reporting requirements for the ship fuel oil consumption.
- 3.4 This Administration accepts all methods for collecting data on fuel oil consumption, distance travelled, and hours underway, which follow the guidelines of Resolution MEPC.282(70).
- 3.5 Reporting of fuel consumption data shall be completed for each ship individually, based on the report format indicated in MARPOL Annex VI, Appendix IX.

4. Contact

- 4.1. Should you require any additional information, you may contact our Technical Department as provided below:

PIC: Ayaz Burud

E-mail: info@nta.gov.km / info@comorosmaritime.org

Tel. (Office hours): +2697739779

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We take this opportunity to reassure that human life, marine environment and property are always considered as a priority for the Maritime Administration of Comoros which is committed to the safety of the maritime industry and the users around the world.



Maritime Affairs Department

**Said Salim
Registrar**