



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 **31<sup>st</sup> 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 31<sup>st</sup> 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 31<sup>st</sup> 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 **30<sup>th</sup> of April of each calendar year**. The “Document of Compliance” should be issued by the **30<sup>th</sup> 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 30<sup>th</sup> 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 CO<sub>2</sub> (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 31<sup>st</sup> 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 30<sup>th</sup> 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](mailto: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