

CIRCULAR

Updates on UK MRV

Following C21004, this Circular wish to inform all parties concern on the UK MRV Scheme that became the third CO2 reporting scheme, alongside the EU MRV and IMO DCS Regulations. Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors

C21034 | 13 October 2021

As of 01 January 2021, the United Kingdom (UK) is treated by European Union (EU) law as a third country. This diverts to the fact that Regulation (EU) 2015/757 on the Monitoring, Reporting and Verification of Carbon Dioxide (CO2) from Maritime Transport (known as the "EU MRV Regulation") no longer applies to the UK.

The EU-MRV Regulation requires shipowners to record CO2 emissions of all ships over 5,000 GT during their voyages from their last port of call to an EU port and from an EU port to their next port of call, as well as within EU ports.

The Department of Transport (DoT) of UK has published guidelines on preparations to be made by ship operators and Verifiers to comply with the emissions data reporting required under the legislation underpinning the UK MRV regime.

The UK Monitoring, Reporting and Verification (MRV) regime includes the obligation for ship operators and verifiers to collect and report emissions data.

Requirements under the UK MRV regime

- Ships over 5,000 gross tonnes, transporting cargo and/or passengers for commercial purposes to and from UK ports, between UK ports or within UK ports (including while at berth), are subject to the UK MRV regime;
- The same exceptions apply to vessels under the UK MRV regime (e.g. for warships), that apply under the EU MRV regime;
- Ship operators must have in place an assessed monitoring plan before data collection begins;
- The assessment of the monitoring plan and the verification of the annual emission report foreach ship needs to be done by an accredited verifier. The verifier must be accredited by UKAS;
- Each ship must have its emissions monitored and its data collected for each reporting period, ready for verification;
- By 30 April following each reporting period, a verified emissions report must be submitted to the UK Administration covering the previous reporting period;

- By 30 June following each reporting period, a valid Document of Compliance (DoC) must be carried on board each vessel covering the previous reporting period;
- A DoC issued under the EU MRV regime and which covers voyages between the UK and European Economic Area (EEA) ports is recognised as a UK DoC equivalent for those voyages only; and
- There are requirements on the Administration to make MRV data available and report annually on the findings.

An assessed UK MRV monitoring plan needs to be in place by December 31, 2021. If a ship already uses a monitoring plan under the EU MRV regime, the ship operator should confirm with the verifier if this is suitable for the UK MRV regime, or if changes are needed.

The UK is no longer part of the EU MRV regime, but operators will still need to collect data on voyages between the UK and EEA, and vice-versa, for input into the existing EU MRV regime. Although under UK legislation, data should be monitored for all voyages to, from and between UK ports we recognise that ship operators will continue to monitor and report data for voyages between the UK and EEA countries under the EU MRV regime. Consequently, to prevent duplication and to simplify procedures, we are asking ship operators not to include data on UK – EEA voyages, and vice-versa, in their emissions report for the UK MRV regime. The place of UK – EEA voyages, and vice-versa, within the UK MRV is something the Department will consider when the legislation is next reviewed. Until then, the only emissions data we require to be reported under the UK MRV regime are for the following voyages:

- Voyages between two UK ports;
- Voyages between a UK and non-EEA port; and
- Emissions generated at a UK port for the above voyages.

Dromon acting as your single Verification Body for EU MRV, UK MRV and IMO DCS

Dromon is currently under process to be re-accredited as a Verification Body under the United Kingdom Accreditation Service (UKAS).

Since the three reporting schemes run in parallel, Dromon can act as a single Verification Body for the EU MRV, UK MRV and IMO DCS schemes. Given that the three schemes have a number of similarities, the verification process can take place at one verification audit using the same source of data therefore, reducing the regulatory burden.

Act now

Ship Owners / Managers / Operators should take into consideration the above updates and use this year to prepare their systems and procedures to begin collecting emissions data for the 2022 reporting period.