

# EU-MRV Frequently Asked Questions

Which ships are in the scope of the EU MRV regulations?

ANSWER:

The EU MRV is applicable for ships above 5,000 GT. Exempted are warships, naval auxiliaries, fish-catching or fish-processing ships, wooden ships of a primitive build, ships not propelled by mechanical means and government ships used for non-commercial purposes (ref. 2015/757 Art. 2.1 and 2.2).

Furthermore, it is not applicable for ship movements and activities not serving the purpose of transporting cargo or passengers for commercial purposes, such as dredging, ice breaking, pipe laying or offshore installation activities (ref. preamble [14] of Reg. 757). For further information, please refer to the second answer on the EMSA homepage.

Please note: NMA (Norway) deems offshore supply ships delivering people and cargo to offshore installations as not subject to the MRV regulation.

Does the EU MRV also cover CO<sub>2</sub> emissions from a ship in port or at berth?

ANSWER:

Yes, the EU MRV also covers CO<sub>2</sub> emissions in EU ports, including emissions arising from ships at berth or ships moving within a port.

What is a “voyage”? What is the exact starting and ending point of voyages?

ANSWER:

The EU MRV regulation applies the berth-to-berth concept for voyages. Hence, a voyage starts at berth of one port of call and ends at berth of the next port of call.

Sailing with a pilot and/or anchoring while waiting for port entrance are part of the voyage. The time spent at sea shall be calculated based on port departure and arrival information and shall exclude anchoring.

Which voyages are to be reported for EU-MRV?

ANSWER:

For a voyage to be covered by the EU MRV, at least one of the two ports of call of the voyage must be located in an EU territory, i.e. voyages into, within and out of the EU shall be reported.

Is a port stay for bunkering considered a port call for EU-MRV?

ANSWER:

No, only ports where cargo is loaded or unloaded or where passengers embark or disembark are considered ports of call. Consequently, stops for the sole purpose of refuelling, obtaining supplies, relieving the crew, going into dry dock or making repairs to the ship and/or its equipment, as well as stops in port because the ship is in need of assistance or in distress, stops for ship-to-ship transfers carried out outside ports and stops for the sole purpose of taking shelter from adverse weather or rendered necessary by search and rescue activities are excluded.

What is an EU port under the jurisdiction of a member state of EU-MRV?

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## ANSWER:

The expression “ports under the jurisdiction of a Member State” refers to ports located in “EU territory”, i.e. to which EU law fully applies: ports in the nine EU outermost regions (Açores, Madeira, Canarias, Guadeloupe, French Guyana, Martinique, Mayotte, Saint Martin and Reunion), and also ports in Norway (except those on Svarbald) and Iceland qualify as EU ports.

EEA member states' overseas countries and territories which do not qualify as EU ports of call: Greenland and the Faroe Islands, French Polynesia, New Caledonia, Saint Barthélemy, Saint Pierre and Miquelon, Wallis and Futuna, Aruba, Bonaire, Saba, Sint Eustatius, Curaçao, Sint Maarten, Anguilla, Bermuda, British Antarctic Territory, British Indian Ocean Territory, British Virgin Islands, Cayman Islands, Falkland Islands, Bailiwick of Guernsey, Isle of Man, Jersey, Montserrat, Pitcairn, Henderson, Ducie and Oeno Islands, Saint Helena, Ascension and Tristan da Cunha, South Georgia and the South Sandwich Islands, Turks and Caico Islands, Akrotiri and Dhekelia, Svalbard.

Source: European Commission "Reducing emission from the shipping sector"

## Are we required to monitor each voyage or can we monitor annually?

### ANSWER:

All relevant data need to be monitored on a voyage basis and then aggregated annually.

An exemption is applied to vessels which conduct more than 300 voyages per year and all voyages during this year either start from or end at an EU port. These vessels are excluded from reporting on a per-voyage basis and only have to record and report annual data sets.

## What happens if my ship changes class or flag?

### ANSWER:

The EU MRV is neither class nor flag related, so this will have no effect on the EU MRV reporting.

## Is the EU MRV verification related to class?

### ANSWER:

No, a classification society can also perform the verification for ships not classed with them.

## What if a ship calls an EU port without an approved monitoring plan?

### ANSWER:

The company shall submit a Monitoring Plan to the verifier without undue delay and no later than two months after that ship's first call at a port under the jurisdiction of an EU member state.

## Who is responsible for EU MRV compliance?

### ANSWER:

The company (i.e. ship operator) is responsible for EU MRV compliance.

## When a ship changes company (i.e. ship operator) through the year, how is this handled?

### ANSWER:

If a ship changes company, the new company shall ensure that the ship under its responsibility complies with the requirements of the EU MRV in relation to the entire reporting period during which it takes responsibility for the ship concerned (ref. 2015-757, Art. 11.2).

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“Reporting periods” as per the EU MRV are the calendar years. In other words, if the operator takes over the responsibility during a calendar year, he is responsible for the reporting for that entire calendar year. We recommend that operators taking over vessels during a reporting period check and consider for the purchase how the previous owner has monitored and documented the relevant parameters for reporting the emissions during “his” part of the reporting period.

Does a classification society issue "exemption letters" stating that a certain ship is not subject to MRV?

ANSWER:

No, a classification society as verifier only verifies submitted data and issues a DoC based on that report. They are in no position to confirm that a vessel has not been compliant within the scope of EU MRV during previous years, without verification.

Is the installation of offshore wind turbines or the carriage of equipment to offshore windfarms subject to MRV?

ANSWER:

No, according to the second answer on the EMSA homepage, movements related to the installation of wind turbines offshore or to carriage of supplies to wind turbines are subject to the EU MRV.

Is the EEDI or EIV a mandatory requirement of the MRV regulation 2015/757 EN?

ANSWER:

According to 2015/757 EN, Art. 11.3, the emissions report shall state the technical efficiency, i.e. EEDI/EIV.

If missing, this information must be provided prior to submitting the emission report. Provide the ship's EEDI as given on the Energy Efficiency Certificate, or, in case the ship does not have an attained EEDI, the EIV (Estimated Index Value) should be given instead. The EIV should be calculated according to MEPC.231(65). Data should also be available and consistent in THETIS.

How are EIV or EEDI calculated and which one of the indices are we required to state in the Emissions Report for our vessel?

ANSWER:

The EIV for cruise passenger ships with non-conventional propulsion is calculated according to MEPC.233(65), for all other vessels according to MEPC.231(65). EEDI is calculated according to MEPC.308(73).

The requirements regarding the declaration of EIV or EEDI in the ER for a particular vessel are as follows: If an Energy Efficiency Certificate (EEC) has been issued on the vessel, the EEDI is stated on that EEC and shall be stated in the ER. In all other cases the EIV needs to be stated, except for:

- Passenger ships
- Cruise ships with conventional propulsion
- Ship category “other” as defined in the MRV regulation
- Ships with non-conventional propulsion other than LNG-carriers or cruise ships