

# IMO-DCS Frequently Asked Questions

What is the different flags' scope of authorization for SEEMP II and FOC-R verification?

ANSWER:

Most flags have authorized the Verifiers for all five tasks:

1. Verification of SEEMP II.
2. Issuance of the confirmation of compliance (CoC) on the SEEMP II.
3. Verification of fuel oil consumption report (FOC-R) data.
4. Issuance of the statement of compliance (SoC) on the FOC-R.
5. Reporting the FOC-R data to IMO-database GISIS.

Several flags have, however, limited the scope of authorization to only some of the five tasks or they have imposed additional requirements, e.g.:

1. Verifiers shall report the FOC-R data to flag (e.g. VUT, PAN)
2. Verifiers shall recommend to flag to issue SoC (e.g. PAN, LBR)
3. Verifiers shall report the disaggregated data to flag (e.g. LBR+)
4. Verifiers shall recommend owner to request issuance of SoC from flag (e.g. MYS)
5. Verifiers shall invoice the ship and pay certain DCS surcharge to flag (e.g. LBR)

Can a vessel (OSV) flying Singapore flag operating merely in Norway be regarded on “local trade” and as such as not as being subject to DCS?

ANSWER:

Usually, a ship operating solely within the economic zone (200 nm) flies the flag of that country and is subject to national rules which may or may not differ from the international rules. For instance, Norway has a regulation stating that SOLAS and MARPOL, for example, apply with some adjustments – the DCS regulation applies without modification for ships in domestic trade. A ship operating on the Norwegian shelf with a non-Norwegian flag is required to have international trading certificates, which includes the DCS statement of compliance.

Can a classification society offer the DCS service for vessels not classed by them?

ANSWER:

Yes, DCS is as a service which can be provided by an RO independent of the class of the vessel, if not instructed otherwise by the responsible flag state authority.

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Are there any exemptions of application for ships with gross tonnage 5,000 tonnes and above for IMO Data Collection System?

ANSWER:

Referring to MARPOL Annex VI, Regulation 19, Applications 2.1 and 2.2, the IMO DCS is not applicable to ships not propelled by mechanical means as well as to platforms, including FPSOs and FSUs and drilling rigs, regardless of their propulsion.

Can a classification society support clients operating vessels flying flags of non-MARPOL parties?

ANSWER:

Yes, an RO can perform such verification work upon request by the owner/manager, but not on behalf of such a flag (ref. MEPC.1/Circ.871 from 4 September 2017).

An RO can also submit data to the IMO on a non-statutory basis.

If a ship changes company during a year, who is responsible to prepare the fuel oil consumption reports in that year?

ANSWER:

Each manager is responsible for reporting his part of the year, i.e. upon change of company, the previous manager shall submit the report for his part of the year (ref. MARPOL Annex VI, Reg. 22A.5).

If the vessel changes flag during the year, does that trigger an FOC-report?

ANSWER:

Yes, a flag change triggers an FOCSR verification for the respective flag period of the vessel (ref. MARPOL Annex VI, Reg. 22A.4).

What are the legal requirements for DCS compliance?

ANSWER:

1. Develop a Data Collection Plan (SEEMP Part II) and have it reviewed by the flag administration or any duly authorized organization.
2. Monitor and report fuel oil consumption data, hours underway and distance travelled, and have the data verified by the flag administration or any duly authorized organization.

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3. Carry a confirmation of compliance on board for the updated SEEMP (from 1 January 2019) and carry the statements of compliance on board for the required fuel oil consumption reports.

Are there any exemptions possible from DCS requirements?

ANSWER:

Exemptions may be granted by the flag administration from any of the requirements in chapter 4 of MARPOL Annex VI as per IMO MEPC.1/Circ.863 (vessels not normally engaged in international voyages).

What are the compliance deadlines for DCS?

Are there any exemptions possible from DCS requirements?

ANSWER:

- 1 September 2019: Submission of the SEEMP Part II to the verifier
- 1 January 2019: Confirmation of compliance (CoC) for the updated SEEMP must be on board
- 30 March each year: Deadline for the submission of the annual fuel oil consumption report to the verifier (MARPOL Reg. 22a)
- 31 May each year: Statement of compliance (SoC) for the fuel oil consumption report must be on board