

Update on Fuel Consumption Data Collection, Proxies and Submission Process

As a result of a submission made by IMCA to the Marine Environment Protection Committee, the International Maritime Organization (IMO) has granted IMCA authority to calculate proxies and submit information on behalf of its members. IMO's review of the result will determine which, if any of the two proposed proxies, will be used to assess the carbon intensity of the offshore and marine contracting sector. Therefore, it is imperative that Members engage with this process and have full oversight of what decision is taken.

IMCA will be contacting all Members impacted by this this mandatory requirement to collect fuel consumption data for the 2019 and 2020 reporting periods to enable Proxies A and Proxy B to be calculate, to enable this information to be submitted to the IMO as soon as possible.

Margaret Fitzgerald, IMCA's Head of Marine Policy & Regulatory Affairs shares an update on the mandatory fuel data collection process for vessel operators.

The IMO is pressing ahead with the development of mandatory short-term measures to reduce CO₂ emissions from international shipping as part of its' GHG strategy and commitment to the targets set by the Paris Agreement. Included in this process is the development of suitable Carbon Intensity Indicator (CII).

Members will be aware that IMCA successfully argued at the IMO that the 'transport work proxy', which has been developed as a CI Indicator for cargo ships, is not a suitable metric for assessing Carbon Intensity of the offshore sector since the measurement of fuel consumed/distance travelled does not reflect how the offshore sector operates.

Going back to 2019, IMCA's Marine Policy & Regulatory Affairs (MPRA) Committee developed two potential proxies which could be used instead of 'transport work' to assess the carbon intensity of the marine and offshore contracting industry. These proxies were submitted to IMO's Marine Environment Protection Committee (MEPC) but due to the sheer volume of proposals on the agenda for that session, IMCA's proposal was deferred for consideration in 2020 by IMO's Intersessional Working Group on Green House Gases which called upon the offshore and marine contracting sector to submit data to IMO on a voluntary basis to enable a decision to be taken on which of the two proxies should be selected for incorporation into future carbon intensity reduction measures.

IMCA expressed concern to IMO Member States about the voluntary nature of submission of data for offshore and marine contracting vessels and cautioned that care is needed to ensure that the proceed is carefully managed to minimise the possibility of selection bias and inadequate quality control leading to a distorted impression when analysing the different proxies.

2021 Progress

IMCA followed this with a submission to the recent Marine Environment Protection Committee (MEPC 76/5/3) in June this year, in which it proposed that IMCA should be authorised to submit data to IMO on behalf of its members on an annual basis during the stage of data collection before one proxy was selected to assess the suitability of the proxies.

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As a result, the IMO has granted IMCA authority to calculate the two proxies we proposed to IMO in 2019 and to submit this information on behalf of its' members.

Because IMCA will be reporting to IMO, we need to be completed transparent with regard to the data collected in respect of the data elements for each of the two proxies as well as the final calculated Proxy A and Proxy B. For this reason, IMCA has amended the fuel consumption spreadsheet, which was circulated to members last year, with one version for 2019 data and one for 2020 [insert ink].

IMO's DCS collects fuel consumption data per calendar year.

1 January 2019 – 31 December 2019

1 January 2020 – 31 December 2020

1 January 2021 – 31 January 2021

Reflecting this reporting period, the MPRA now wants to start collecting 2020 data in addition to the outstanding 2019 data which has not yet been submitted by Members.

Call to Action - Mandatory Requirement

Attention is drawn to the fact that, the requirement for collection and reporting of fuel consumption data is mandatory under Regulation 22A of MARPOL, Annex VI and applies to all vessels of 5,000 gross tonnage and above. The final version of the spreadsheet for 2019 and 2020.

- **Members are urged to complete the updated spreadsheet for the two reporting periods even if you have previously sent us your data.**
- **Please note that you cannot consolidate all your vessels onto a single spreadsheet.**
- **A separate copy of the spreadsheet must be used for each vessel.**

Members are requested to submit the required data via the spreadsheet.

Please download the spreadsheet from links in the right hand column for each year.

Complete your information and fuel consumption date and then email to IMCA – fueldata@imca-int.com.