



THE REPUBLIC OF LIBERIA
LIBERIA MARITIME AUTHORITY

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Marine Operations Note: 07/2022

(This Marine Operations Note supersedes Marine Operations Note 04/2022)

Subject: EU MRV, IMO DCS, CII & EEXI – CO₂ Emission

References: Refer to [Appendix 1](#)

The following change has been included:

- a. The list of authorized Verifiers has been updated

Dear Shipowners/Operators/Recognized Organizations/Verifiers

The purpose of this Marine Operations Note is to provide guidance on compliance with IMO Resolution MEPC.328(76) “Amendments to the Annex of the Protocol of 1997 to Amend MARPOL 73/78 Relating Thereto (2021 Revised MARPOL Annex VI)”, [reference c](#)) in [Appendix 1](#) of this Marine Operations Note, with regard to the amendments to Chapter 4 of MARPOL Annex VI, i.e.:

1. Energy Efficiency Existing Ship Index (EEXI) (Regulations 23 &25)
2. Operational Carbon Intensity Indicator (CII) and Operational Carbon Intensity Rating (Regulation 28)
3. Ship Energy Efficiency Management Plan (SEEMP) (Regulation 26.2 and 26.3)

This Marine Operations Note also provides guidance on continued compliance with regulation 27 of the 2021 Revised MARPOL Annex VI (Collection and Reporting of Ship Fuel Consumption Data), and with EU Regulation 2015/757 (EU MRV), [reference a](#)) in [Appendix 1](#) of this Marine Operations Note.

General Overview

The 2021 Revised MARPOL Annex VI enters into force 1 November 2022. The regulations listed under items 1, 2 and 3 above apply as follows to ships engaged in international voyages

| Regulations | Ship Type | Gross Tonnage |
|-------------|--|-----------------------------|
| 23 | <ul style="list-style-type: none">• Bulk carrier• Combination carrier• Containership• Cruise passenger ship• Gas carrier• General cargo ship• LNG carrier• Refrigerated cargo carrier• Ro-ro cargo ship• Ro-ro cargo ship (vehicle carrier)• Ro-ro passenger | 400 gross tonnage and above |

| | | |
|--------------|---|---|
| | <ul style="list-style-type: none"> • Tanker (oil/chemical) | |
| 25 | <ul style="list-style-type: none"> • Bulk carrier • Combination carrier • Containership • Cruise passenger ship • Gas carrier • General cargo ship • LNG carrier • Refrigerated cargo carrier • Ro-ro cargo ship • Ro-ro cargo ship (vehicle carrier) • Ro-ro passenger • Tanker (oil/chemical) | <ul style="list-style-type: none"> • 10,000 DWT and above • 4,000 DWT and above • 10,000 DWT and above • 25,000 GT and above • 2,000 DWT and above • 3,000 DWT and above • 10,000 DWT and above • 3,000 DWT and above • 1,000 DWT and above • 10,000 DWT and above • 250 DWT and above • 20,000 DWT and above |
| 26.2 and 27* | All Ships | 5000 gross tonnage and above |
| 26.3 and 28 | Ships Types: Same as Regulation 25 above | 5000 gross tonnage and above |

* Regulation 27 was adopted by MEPC.278(70) and entered into effect on 1 March 2018

The Liberian Administration is responsible for ensuring compliance, including verification and reporting of ship fuel oil consumption data and also the operational CII value and corresponding operational carbon intensity rating. The EU regulation applies to all ships that call on ports in Europe. The EU regulation includes a provision that the Commission shall review the regulation and shall, if appropriate, propose amendments to this regulation in order to ensure alignment with an international agreement (IMO DCS).

The EEXI requirement is a technical measure for existing vessels and an EEXI survey is required as part of the verification process; and therefore, the EEXI verification services will be delegated to the Classification Society for the vessel¹. It should be noted the EEXI survey shall take place at the first IAPPC annual, intermediate or renewal survey, whichever is the first, on or after 1 January 2023

The Operational CII requirement is an extension to the IMO DCS where the Administration has actively participated in the development and closely followed the development with the EU MRV Regulation in order to determine the most efficient way forward to serve our Liberian flag Shipowners. There are several common requirements between the two schemes, including monitoring, verification and annual data reporting. Considering the common requirements of the EU MRV and IMO DCS schemes, there are efficiencies to be gained in implementation of both schemes by combining key compliance aspects to the maximum extent possible. This will avoid unnecessary duplication, reduce administrative burdens and thus provide a cost-efficient, streamlined and quality focused service for shipowners covering both regulations.

Considering there are several entities that have been accredited under the EU MRV scheme, including Classification Societies recognized by Liberia, we are offering our Liberian flag shipowners and operators two options for a single service provider to cover both EU MRV and IMODCS:

¹ Shipowners/Operators that may wish to use another RO for their fleet should contact this Administration to discuss and agree on the possible consequences and solutions.

1. Classification Societies recognized by Liberia that have achieved EU MRV verifier accreditation (Classification Society Verifiers); or
2. Independent EU MRV accredited verifiers (non-Classification Society Verifiers)

Shipowners have the option to choose either a Classification Society Verifier or a non-Classification Society Verifier. The Verifier will undertake all the verification work covering both the EU MRV and IMO DCS regulations. The Verifier will conduct the complete verification services required for the EU MRV, including issuance of the approval documentation and reporting. The Verifier will conduct the verification services required for the IMO DCS related to:

1. Verification of SEEMP Parts II (MAPROL VI/26.2) and III (MARPOLVI/26.3)
2. Verification of fuel oil consumption data
3. Verification of attained annual operational CII including corresponding operational carbon intensity rating.

and the Administration will issue the compliance documentation and report the fuel oil consumption data to the IMO.

[Updated Appendix 1 related to POL-009](#) contains the list of Verifiers with whom the Administration has entered into a cooperation agreement for delivering this service. Each authorized Verifier will offer shipowners a streamlined and combined compliance service covering the EU MRV, IMO DCS, CII and SEEMP Parts II and III regulations.

Compliance Process

The implementation schedule is shown in [Appendix 2](#) related to POL-009, and in summary the Verifiers will undertake all the necessary verification work listed above with the exception of the following tasks that will be carried out by the Administration:

1. Issuance of SEEMP Parts II and III Confirmation of Compliance with regulation 26 of the Revised MARPOL Annex VI;
2. Issuance of annual fuel oil consumption and operational carbon intensity rating Statement of Compliance with regulations 27 and 28 of the 2021 Revised MARPOL Annex VI;
3. Conducting verification and company audits of the SEEMP
4. On-board verification of Confirmation of Compliance for SEEMP Parts II and III and Statement of Compliance;
5. Mandatory annual IMO DCS reporting under regulation 27 of the 2021 Revised MARPOL Annex VI.

A new authorization agreement will have to be signed to provide these services on behalf of the Administration. The authorized Verifier selected for the combined EU MRV and IMO DCS services will invoice the shipowner/operator directly for these services.

For more information, please contact the Regulations & Standards Department at regsandstandards@liscr.com or telephone +1 703 790 3434.

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Appendix 1

REFERENCES

- a) **EU Regulation 2015/757 (EU MRV)**
- b) **MARPOL Annex VI, Regulation 22A (IMO DCS)**
- c) **IMO Resolution MEPC.328(76) - Amendments to the Annex of the Protocol of 1997 to Amend MARPOL 73/78 Relating Thereto (2021 Revised MARPOL Annex VI)**
- d) **IMO Resolution MEPC.350(78) - Guidelines on the Method of Calculation of the Attained Energy Efficiency Existing Ship Index (EEXI)**
- e) **IMO Resolution MEPC.351(78) - 2022 Guidelines on Survey and Certification of the Attained Energy Efficiency Existing Ship Index (EEXI)**
- f) **IMO Resolution MEPC.335(76) - 2021 Guidelines on the Shaft-Engine Power Limitation System to Comply with the EEXI Requirements and Use of a Power Reserve (SHaPoLi / EPL)**
- g) **IMO Resolution MEPC.346(78) - 2022 Guidelines for The Development of a Ship Energy Efficiency Management Plan (SEEMP)**
- h) **IMO Resolution MEPC.347(78) - Guidelines for the Verification and Company Audits by the Administration of Part III of The Ship Energy Efficiency Management Plan (SEEMP)**
- i) **IMO Resolution MEPC.348(78) - 2022 Guidelines for Administration Verification of Ship Fuel Oil Consumption Data and Operational Carbon Intensity**
- j) **IMO Resolution MEPC.349(78) - 2022 Guidelines for the Development and Management of the IMO Ship Fuel Oil Consumption Database**
- k) **IMO Resolution MEPC.352(78) - 2022 Guidelines on Operational Carbon Intensity Indicators and the Calculation Methods (CII Guidelines, G1)**
- l) **IMO Resolution MEPC.353(78) - 2022 Guidelines on The Reference Lines for Use with Operational Carbon Intensity Indicators (CII Reference Lines Guidelines, G2)**
- m) **IMO Resolution MEPC.338(76) - 2021 Guidelines on the Operational Intensity Reduction Factors Relative to Reference Lines (CII Reduction Factors Guidelines, G3)**
- n) **IMO Resolution MEPC.354(78) - 2022 Guidelines on the Operational Carbon Intensity Rating of Ships (CII Rating Guidelines, G4)**
- o) **IMO Resolution MEPC.355(78) - 2022 Interim Guidelines on Correction Factors and Voyage Adjustments for CII Calculations (CII Guidelines, G5)**
- p) **Liberia Marine Notice POL-009**

Appendix 2

FUEL OIL CONSUMPTION DATA, CII and SEEMP IMPLEMENTATION SCHEDULE

| YEAR | DATE | ACTION |
|------|--------|---|
| 2022 | 31/DEC | Initial Verification: Issuance of the SEEMP Part III Confirmation of Compliance (CoC) |
| 2023 | 01/JAN | Start of fuel oil consumption data collection and CII Year 2023 (Updated SEEMP in place; Confirmation of Compliance (CoC) in place) |
| | 31/MAR | Deadline for submission of 2022 fuel oil consumption for verification |
| | 31/MAY | Deadline for issuance of SoC for 2022 (valid until 31 May 2024) |
| | 30/JUN | Deadline for transfer of 2022 data to DCS |
| | 30/NOV | Deadline for Company audits, if conducted |
| | 31/DEC | End of fuel oil consumption data collection and CII Year 2023 |
| 2024 | 01/JAN | Start of fuel oil consumption data and CII Year 2024 |
| | 31/MAR | Deadline for submission of 2023 fuel oil consumption data and CII for verification |
| | 30/APR | For ships rated E in 2023, only Deadline for submission of Corrective Action Plan to be implemented in 2024 and 2025 |
| | 31/MAY | Additional verification, if applicable Deadline for issuance of SoC for 2023 (valid until 31 May 2025) |
| | 30/JUN | Deadline for transfer of 2023 data to DCS |
| | 30/NOV | Deadline for Company audits, if conducted |
| | 31/DEC | End of fuel oil consumption data collection and CII Year 2024 |
| 2025 | 01/JAN | Start of fuel oil consumption data and CII Year 2025 |
| | 31/MAR | Deadline for submission of 2024 fuel oil consumption data and CII for verification |
| | 30/APR | For ships rated E in 2024, only Deadline for submission of Corrective Action Plan to be implemented in 2025 and 2026 (at the discretion of the Administration to require a new Corrective Action Plan or previous one can be continuously implemented) |
| | 31/MAY | Deadline for issuance of SoC for 2024 (valid until 31 May 2026) |
| | 30/JUN | Deadline for transfer of 2024 data to DCS |
| | 30/NOV | Deadline for Company audits, if conducted |
| | 31/DEC | Periodical verification: Issuance of the Confirmation of Compliance (CoC) for updated SEEMP related to upcoming three-year period. End of fuel oil consumption data collection and CII Year 2025 |
| 2026 | 01/JAN | Start of fuel oil consumption data and CII Year 2026 |
| | 31/MAR | Deadline for submission of 2025 fuel oil consumption data and CII for verification |
| | 30/APR | For ships rated D in 2023-2025 or E in 2025, only Deadline for submission of Corrective Action Plan to be implemented in 2026 and 2027 (at the discretion of the Administration to require a new Corrective Action Plan or previous one can be continuously implemented) |
| | 31/MAY | Deadline for issuance of SoC for 2025 (valid until 31 May 2027) |
| | 30/JUN | Deadline for transfer of 2025 data to DCS |
| | 30/NOV | Deadline for Company audits, if conducted |
| | 31/DEC | Periodical verification: Issuance of the Confirmation of Compliance (CoC) for updated SEEMP related to upcoming three-year period. End of fuel oil consumption data collection and CII Year 2026 |