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Maritime & Coastguard Agency

Guidance

MIN 669 (M+F) Amendment 1 - Reporting emissions data into the UK MRV regime

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1. Introduction/Background

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

1.2 In order to help the industry prepare to start reporting under the UK MRV the Department for Transport has prepared the following information attached as an Annex. This provides advice to stakeholders on legal and practical considerations for the introduction of the UK MRV regime.

1.3 As detailed in the Annex, although the legislation underpinning the UK MRV regime required data to be collected from the 2021 period onward, the Department recognised the need for further preparation and required the data collection to commence from January 2022. Additionally, the Department is working to develop a digital reporting system and has taken a decision to delay the requirement for ship operators to report emissions until the digital reporting system is fully operational. Ship operators and verifiers should continue to collect, verify and hold the data routinely, but are not required to report the data until further guidance on the digital reporting system is issued. No enforcement action will be taken by the Maritime and Coastguard Agency until reporting begins.

1.4 Please refer to the Annex for further details.

More information

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Annex A

Information note for maritime stakeholders: UK Monitoring, Reporting and Verification of CO2 emissions from ships (UK MRV) regime.

About this note

This note provides initial advice to stakeholders on legal and practical considerations for the introduction of the new UK MRV regime.

The legislation (https://www.legislation.gov.uk/uksi/2018/1388/contents/made) establishing the new UK MRV regime is now in place and whilst the Department is establishing the new processes needed for its practical operation, this note sets out our expectations of stakeholders. While we expect operators to have collected and verified the data for 2022 as in the previous note, we expect this to resume for all subsequent years. We do not expect any data to be reported until further guidance is issued. Therefore, no enforcement action will be taken by the MCA until reporting starts.

Key legal 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 exemptions apply to vessels under the UK MRV regime (e.g. for warships), that apply under the EU MRV regime [footnote 1].
- Ship operators must have in place an assessed monitoring plan before data collection begins [footnote 2].
- The assessment of the monitoring plan and the verification of the annual emission report for each ship needs to be done by an accredited verifier. The verifier must be accredited by the United Kingdom Accreditation Service (UKAS).
- Each ship must have its emissions monitored and its data collected for each reporting period, ready for verification.

The following points will also be key legal requirements of the UK MRV regime once the reporting obligation commences.

- 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 [footnote 3].
- A DoC issued under the EU MRV regime and which covers voyages between the UK and European Economic Area (EEA) ports [footnote 4] is recognised as a UK DoC equivalent for those voyages only.
- There are requirements on DfT to make MRV data available and report annually on the findings.

Approach to practical establishment of the UK MRV scheme

Although the UK is no longer part of the EU MRV regime, it has retained and amended EU legislation, so that it establishes a UK MRV regime to monitor, report and verify emissions data from ships calling at UK ports.

The main elements in the establishment of the new regime which stakeholders should be aware of are that:

- Ship operators should be collecting emissions data for their ships under the UK MRV regime from 1 January 2022.
- No emissions data should be supplied for 2021 for the UK MRV regime, although data for voyages between the UK and countries in the EEA should still be reported to the European Commission under the EU MRV regime. Any emissions data for voyages to and from UK ports in 2020 should have been reported to the European Commission by April 2021.
- The type of vessel within scope of the UK MRV regime and type of emissions data for collection will be the same as those under the EU MRV regime.
- To avoid duplication, we will not be expecting data for voyages between UK and EEA ports, and vice-versa, to be reported under the UK MRV regime. Data on these voyages should continue to be submitted to the European Commission under the EU MRV regime.
- Emissions data for voyages between UK ports, between UK and non-EEA ports, and vice-versa, and from vessels at berth in a UK port will need to be included in the UK MRV emissions report.
- Until reporting is required, a separate DoC will not be required by ship operators to cover voyages to and from UK ports, made in the previous reporting period, which fall outside the scope of the EU MRV.
- From 1 January 2024, all verifiers must be accredited by the United Kingdom Accreditation Service (UKAS) ship owners should check the status of their verifier(s). The Department has agreed to extend the initial period during which the UK will allow verifiers accredited for the EU MRV by a European National Accreditation Body (NAB) to be recognised as verifiers under the UK MRV regime, until the end of 2023.
- An assessed UK MRV monitoring plan should already be in place.
- The UK no longer has access to the EU's THETIS-MRV database. Data reports will be entered into a separate digital reporting system which is under development.

Background

On 31 January 2020, the UK withdrew from the EU. A transition period applied until 31 December 2020, during which EU law continued to apply in the UK. Since then, the UK has had a new relationship with the EU based on the 'EU-UK Trade and Cooperation Agreement'.

On 16 July 2020, the European Commission published a <u>notice to</u> <u>stakeholders (https://ec.europa.eu/info/sites/default/files/file_import/co2-emissions-</u> <u>reporting-in-maritime-transport_en_0.pdf</u>). This explained the impact of the UK's withdrawal from the EU and the effect this would have on the EU monitoring, reporting and verification of emissions data for shipping. Stakeholders were advised that at the end of 2020:

- Verifiers under the EU MRV regime would need to be accredited by a national body of an EU Member State to carry out verification activities. It was no longer sufficient to be accredited by the United Kingdom Accreditation Service (UKAS).
- Regulation (EU) 2015/757 on Monitoring, Reporting and Verification of Carbon Dioxide (CO2) Emissions from Maritime Transport, would no longer apply to the UK.
- After the end of the transition period, emissions data within ports under the jurisdiction of the UK; or from voyages from a port of the UK to the port of a third country, and vice-versa, should no longer be reported under the EU MRV regime.

UK policy on ship emissions

In January 2019 the Government published <u>Maritime 2050</u> (https://www.gov.uk/government/publications/maritime-2050-navigating-the-future), setting out our vision for the future of the maritime sector, and this was followed in July 2019 by the <u>Clean Maritime Plan</u> (https://www.gov.uk/government/publications/clean-maritime-plan-maritime-2050environment-route-map). These documents set out an ambitious path for the transition to zero emission shipping supporting our binding carbon budgets and overarching commitment for the UK to reach net zero emissions across the economy by 2050.

Furthermore, in reference to the carbon budget 6 (CB6) the Government has recently agreed that emissions from international aviation and maritime would be accounted for in UK emissions totals. Consequently, it is more important than ever to have an accurate record of emissions from ships using UK ports.

Purpose of the UK MRV regime

The Government has set itself ambitious national targets for reducing greenhouse gas emissions. Other sectors of the economy already have systems in place, and we expect shipping to play its part in achieving those reductions. The UK also supports international and regional initiatives to reduce greenhouse gas emissions from international shipping, and the first step in achieving this goal is to have an effective and reliable system of monitoring and reporting ship emissions. The data submitted under the UK MRV regime will form part of the evidence base that informs the UK Government's policy on decarbonising maritime.

The new UK MRV regime is the responsibility of the Secretary of State for Transport and will be enforced by ship inspectors from the UK's Maritime and Coastguard Agency (MCA). The Secretary of State has an obligation to make reported MRV data publicly available, and the intention is to submit an aggregated summary of the findings for each reporting year to the IMO, to inform discussions on emission reductions for international shipping.

UK Legislation

Although the UK is no longer part of the EU MRV regime, the EU Regulation which established that regime (Regulation (EU) 2015/757) was retained in domestic law under the EU (Withdrawal) Act 2018, subject to amendments needed to make it operable in a UK-only context.

We have also retained, and, where necessary, amended the following legislation: Commission Delegated Regulation (EU) 2016/2071 (ship emissions monitoring methods); Commission Implementing Regulation (EU) 2016/1928 (cargo carried); Commission Implementing Regulation (EU) 2016/1927 (ship emissions templates) and Commission Delegated Regulation (EU) 2016/2072 (shipping emissions verification and accreditation). The legislation establishing the UK MRV regime is therefore similar to the EU MRV regime, but the amendments to it are set out in the Merchant Shipping (Monitoring, Reporting and Verification of Carbon Dioxide Emissions) (Amendment) (EU Exit) Regulations 2018 (SI 2018/1388) (https://www.legislation.gov.uk/uksi/2018/1388/pdfs/uksi 20181388 en.pdf). This amended Regulation (EU) 2015/757 and made small changes to the templates in Regulation (EU) 2016/1927 regarding the monitoring plan and emissions reports. A link to the UK templates for the monitoring plan, the emissions report and the document of compliance will be made available on the gov.uk website prior to the digital system launch.

Vessels in scope

Vessels which are subject to the EU MRV regime are also within scope of the UK MRV.

The UK MRV regime covers ships over 5,000 gross tonnage (irrespective of their Flag State or where the ship operator is registered) which serve the purpose of transporting cargo and passengers for commercial purposes to and from UK ports. Categories of ships excluded include warships, naval auxiliaries, fish-catching or fish-processing ships, ships not propelled by mechanical means, and government ships used for non-commercial purposes. Some ship movements, such as the extraction and carriage of dredged material, laying or repairing cables and supporting offshore installations are not subject to the UK MRV requirements (see Annex A).

Voyage and emissions data required under the UK MRV regime.

The type of data and parameters which need to be monitored on a pervoyage basis under the UK MRV regime are the same as those required under the EU MRV regime. They include:

- Port of departure and port of arrival including the date and hour of departure and arrival.
- Amount and emission factor for each type of fuel consumed in total.
- CO2 emitted.
- Distance travelled.
- Time spent at sea.
- Cargo carried.
- Transport work.

Similar parameters apply under the UK MRV for monitoring emissions on an annual basis. These are:

- The amount and emission factor for each type of fuel consumed in total.
- Total aggregated CO2 emitted within the scope of the Regulation.
- Aggregated CO2 emissions from all voyages between ports in the UK.
- Aggregated CO2 emissions from voyages which departed from ports in the UK (except those going to a port in the EEA).
- Aggregated CO2 emissions from voyages to ports in the UK (except those originating from a port in the EEA).
- CO2 emissions which occurred within ports in the UK at berth (including when stopping on voyages between UK and EEA ports).

- Total distance travelled.
- Total time spent at sea.
- Total transport work.
- Average energy efficiency.

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 could be subject to change in future. Under current requirements, 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
- Emissions generated at a UK port for the above voyages and when at berth at a UK port on voyages between UK and EEA ports.

Voyages between a port in the UK and a port in one of the UK Overseas Territories or Crown Dependencies – such as the Falkland Islands, Gibraltar, Isle of Man, Jersey – need to be monitored and reported under the UK MRV regime. However, ports in these overseas territories and Crown Dependencies do not count as UK ports under the UK MRV regime. So, voyages between two Crown Dependencies or Overseas Territories – such as between Jersey and Guernsey – should not be included. Likewise, a journey from a port in an overseas territory or Crown dependency to a non-UK port should not be included.

Biofuels

Appropriate emission factors shall be applied for biofuels, alternative nonfossil fuels and other fuels for which no default values are specified. Based around an agreed approach from the EU Renewable Energy Directive II (Directive (EU) 2018/2001) Annex V, Part C, item 13, CO2 emissions in use of biofuels and bioliquids is zero. We therefore advise a CO2 emission factor of zero for biofuels and bioliquids which are certified as sustainable under schemes recognised by the European Commission in accordance with the Renewable Energy Directive. For blends, the CO2 emission factor should be based on the weighted average of the emission factors for the respective fuels: e.g. 10% biofuel and 90% MGO will have an emission factor of 0.1 x 0 + 0.9 x 3.206 = 2.885. We suggest ship operators use this as guidance to calculate CO2 emissions for biofuels. We recognise that this does not account for the reporting of future maritime low carbon fuels and is subject to further developments at IMO, we will therefore continue to review this position.

Becoming an accredited UK MRV Verifier

The verifier is responsible for assessing how well the monitoring plan complies with Article 6 and 7 of the UK's retained EU Regulation 2015/757, and for assessing whether the emissions report meets the requirements laid down in Articles 8-12 and Annexes I and II. As with the EU MRV regime, there is no obstacle for non-UK or non-EEA based companies becoming verifiers under the UK MRV regime. Ship operators will be able to select any duly accredited verifier irrespective of the ship's flag or the place where the company operating the ship is based or where the accredited verifier is based.

However, the rules about the accreditation of verifiers are different. Under the EU MRV regime, National Accreditation Bodies (NABs) pursuant to <u>EU</u> <u>Regulation (EC) 765/2008 (https://eur-lex.europa.eu/legal-content/EN/TXT/?</u> <u>uri=CELEX:32008R0765</u>) are the sole competent bodies in EEA Member States granting accreditation to legal entities performing verification activities for ships. However, the UK's retained version of Regulation (EC) 765/2008, has been amended so that only the UK's NAB (UKAS) is recognised for accreditation purposes [footnote 6].

All existing verifiers which have UKAS accreditation for the EU MRV regime in accordance with EN/ISO 14065 will be recognised by the UK as a verifier under the UK MRV regime – although their status will need to be updated to reflect their responsibilities with regard to the UK MRV regime. Verifiers which are accredited for the EU MRV regime by a European NAB, will be temporarily accepted as verifiers under the UK MRV regime until the end of 2023, as part of the preparations for the establishment of the UK MRV regime. However, from 1 January 2024 all verifiers will be expected to have UKAS accreditation. Verifiers which have been accredited by an EU NAB, will need to apply to UKAS for accreditation if they wish to remain a verifier under the UK MRV regime after 2023.

Electronic applications for accreditation can be accessed via the <u>UKAS</u> <u>website (https://www.ukas.com/accreditation/about/apply-for-accreditation/)</u> and submissions and supporting forms/AC10 to be made to <u>apps@ukas.com</u>.

Alternatively, applications they can be posted to;

United Kingdom UKAS - United Kingdom Accreditation Service 2 Pine Trees Chertsey Lane STAINES-UPON-THAMES, TW18 3HR

Telephone: + 44 17 84 42 9000 Website: <u>www.ukas.com</u> (<u>https://www.gov.uk/government/publications/min-669-mf-reporting-emissions-data-into-the-uk-mrv-regime/www.ukas.com</u>) E-mail: <u>info@ukas.com</u>

Accreditation normally takes around 12 months, so we recommend applications are submitted to UKAS as soon as practicable.

A list of MRV verifiers which UKAS has accredited for the EU MRV can be found on the verification / validation section of the <u>UKAS website</u> (https://www.ukas.com/find-an-organisation/browse-by-category/?cat=2541).

There is no requirement for UK MRV accredited verifiers to have a physical office in the UK or to be a legal entity registered in the UK.

On-board IT systems

The introduction of a third emissions monitoring system to operate alongside the existing EU MRV regime and IMO DCS system on some ships may necessitate a change to onboard ship systems and procedures. It is strongly recommended that ship operators check with their system-provider to find out if their existing onboard emissions monitoring system should be adjusted to accommodate reporting requirements under the UK MRV regime. Some systems may already be able to separately identify the relevant data for the three reporting regimes, so that one set of data and bunker reports cover all three reporting schemes, but others may require adjustment. By aligning the UK MRV regime as closely as possible with the EU MRV regime, our aim has been to minimise the burden on the sector.

Production of a monitoring plan

Ship operators must produce a monitoring plan for each of their ships to indicate the method they will use to monitor and report emissions data, based on fuel consumption and other parameters, such as distance travelled, time at sea and cargo carried on a per voyage basis. The objective is to gather annual data into an emissions report, ready for validation by an accredited MRV shipping verifier. Under the UK's retained legislation, the UK template is virtually identical to that used under the EU's MRV regime [footnote 7]. The monitoring plan must be assessed by the verifier and any non-conformities addressed by the ship operator before any data can be collected under the UK MRV regime. Ships calling at UK ports which do not currently have a monitoring plan, should have a plan in place which conforms to the requirements [footnote 8].

Responsibility for assessing the monitoring plans for the UK MRV regime rests with verifiers that are recognised by the UK. If the verifier is content, those ship operators with an existing monitoring plan which conforms to the EU MRV regime, may use their existing plan – appropriately modified if necessary – for both the EU and the UK MRV regime. For example, a modification may be needed to indicate which voyages will be reported under the UK MRV regime.

Ship operators should have checked with their verifiers about the suitability of their existing monitoring plans for the UK MRV regime to ensure the plan conforms to the requirements [footnote 9]. Where the existing assessed monitoring plan has been / or will need to be revised to meet the UK MRV requirements, then the monitoring plan will need to be reassessed. As with the EU MRV regime:

- your monitoring plan should be checked annually to ensure it reflects the nature and functioning of the ship and whether the monitoring method can be improved. The verifier should be notified of any modification.
- ship operators must submit a monitoring plan to the verifier for newly acquired vessels, no later than two months after the ship's first call to a UK port. This action should be complete for the UK MRV regime.

There are no specific legal requirements regarding the way ship operators submit their monitoring plans to the accredited verifier, so it is up to the parties to agree these procedures bilaterally. Only the ship operator and verifier need to see the full monitoring plan. There is no legal requirement for a copy of the monitoring plan:

- to be carried on board the ship (although the crew may need a copy to ensure proper collection of emissions data),
- to be submitted to the UK Administration, or
- to be uploaded onto the new UK reporting system, once available.

Collecting data

Under the UK MRV regime, ship operators are required (based on the ship's satisfactorily assessed monitoring plan), to monitor the emissions with a view to aggregating data into an annual emissions report. Normally, ship

operators would monitor and provide data on each individual voyage (monitoring data on a per-voyage basis). But like the EU MRV regime, a ship can be exempt from this obligation if all the voyages during the reporting period either start or finish at a UK port, and the ship performs more than 300 voyages during the reporting period. To use the exemption, ship operators have to document their procedures to calculate aggregated data in the monitoring plan, for example the use of other data and documents (such as Bunker Delivery Notes) used to calculate the ship's aggregated data.

Emissions occurring within a UK port of call are to be reported annually as an aggregated annual figure and a separate item under the emissions report. Cargo and other related parameters such as "distance travelled" or "cargo carried" should not be included when reporting emissions which occur within a UK port.

For voyages starting and ending in two different calendar years, the monitoring and reporting data shall be accounted under the first calendar year concerned. Consequently, no emissions data should be reported under the UK MRV for a voyage which begins in 2021 and finishes in 2022, because the UK is not collecting 2021 emissions data. However, once reporting commences, operators will need to include any emissions from a voyage which begins in 2022 and finishes in 2023. This approach should be continued for subsequent years.

If a ship operator purchases a second-hand ship during a reporting period, then it is the new company's responsibility to get all the necessary information and emissions data from the previous owner as soon as possible, to ensure it can provide a full emissions report at the end of the reporting period.

Reporting data

Ship operators must submit verified emissions reports for each ship, for each reporting period from 2022 onwards once the reporting system is fully operational. Further details on this process will be issued in due course. However, ship operators should continue to submit their emission reports to the verifier each year by April. For the reporting period of 2022 data, a grace period for verification of data will allow an extension in data verification until June 2023. When the verifier receives the report, they will need to be satisfied that the report for each ship meets the regulatory requirements, is not missing any important information and the report is broadly aligned with other ship's data – e.g. vessel tracking via the ship's Automatic Identification System (AIS). When the verifier is content with the data, we expect ship operators to store the data until reporting starts. A DoC will not be required until reporting resumes.

Data on voyages between UK and EEA ports, and vice-versa, should be reported to the European Commission as part of the EU MRV regime report and should not be included in the UK MRV report (pending further review of the legislation).

Article 11 of retained EU Regulation 2015/757 identifies the information to be included in the emissions report. Article 12 of retained EU Regulation 2015/757 requires the emissions report to be submitted using automated systems and data exchange formats. The UK no longer has access to the THETIS-MRV database, and consequently is developing a cross-sectoral database that can receive MRV data from all the UK industrial sectors that are in scope of MRV legislation.

Further information about the process for reporting ship emissions data onto the new UK MRV digital reporting system will be provided in due course.

Notification

The ship emissions report must be validated by a verifier before a DoC can be issued to the ship operator and distributed to individual ships. Once reporting starts, a DoC will be required for the 2022 reporting period onwards, therefore data should continue to be verified for each reporting period. Further information on the process for producing, distributing and notifying the MCA about the issue of the DoC will be provided in due course.

Compliance and enforcement

Until reporting resumes and further guidance is issued, ship operators are not required to carry a valid DoC for any ships that were subject to the UK MRV regime in the previous reporting period. No enforcement action will be taken by the MCA until reporting resumes. An EU DoC will be recognised for voyages between UK and EEA ports. However, once reporting resumes a separate UK DoC will be needed to confirm that a validated emissions report for voyages between UK ports, and between UK ports and non-EEA ports (and vice-versa), was submitted for each reporting period from 2022 onwards.

Publication of information

The UK MRV regime includes similar commitments to those in the EU MRV regime about publishing MRV data. Consequently, once reporting resumes:

- the information on emissions data reported in accordance with Article 11 of retained EU Regulation 2015/757 will be made available.
- an annual report on emissions data and other relevant information from maritime transport, including aggregated and explained results, will be published.

Future developments

We will continue to monitor all amendments made to the existing EU MRV regime. We will continue to review our policy to ensure it is fit for purpose and delivering the evidence we need to support future policy interventions to decarbonise shipping.

Annex B

Which activities are covered by the UK MRV Shipping Regulation?

The UK MRV Regulation sets monitoring and reporting obligations for UK-related voyages.

Ship's activities originating or terminating in a port of call and serving the purpose of transporting passengers and cargo for commercial purposes are defined as voyages.

Ballast voyages, from the last port of call where the ship has discharged cargo or disembarked passengers to the next port of call where cargo is loaded or passengers embark, also serve the purpose of transporting cargo and are therefore subject to the Regulation.

On the other hand, ships' movements that do not serve the purpose of transporting cargo or passengers for commercial purposes are not subject to the monitoring, reporting and verification requirements and are not required to carry a valid DoC.

For example:

- carriage or/and accommodation of personnel that perform activities for commercial undertakings unrelated to cargo and passenger transport,
- all forms of extraction and subsequent carriage of dredged material,
- ice-breaking activities,
- carrying, laying, and repairing of cables/pipelines for underwater for telecommunications, electric power transmission, or other purposes;
- hydrographic or bathymetric survey activities.
- testing or commissioning of semi-autonomous, autonomous shipping.
- naval, coast guard, border control or fisheries protection activities.
- vessels engaged in the testing, launch or recovery of submersible drone technology.
- providing support to offshore installations, such as drilling rigs, natural gas and oil platforms, offshore wind farms, and including in particular:

i. carriage and positioning of anchors for drilling rigs,

ii. providing towage, salvage or other marine assistance/services to offshore installations,

iii. carriage of supplies and equipment to/ from offshore installations and ships,

iv. safety or rescue services provided to offshore installations,

v. diving support,

vi. storing oil or gas without processing it,

vii. installation and decommissioning of subsea structures and offshore installations.

- 1. Although UK MRV legislation includes the monitoring, collecting and reporting of emissions data for voyages between UK and European Economic Area (EEA) ports; our current position (pending any subsequent review), is that the emissions data from these voyages should not be monitored, verified, and reported for the UK MRV regime.
- 2. If the verifier is content, an existing monitoring plan under the EU MRV regime for the vessel may be used (appropriately modified as necessary) for both the EU and the UK MRV regime.
- 3. A valid UK DoC will be needed from 30 June 2023, for voyages subject to the UK MRV regime in the previous reporting period.
- 4. EEA port includes EU States, Norway, Iceland and ports in the EEA outermost regions such as the Acores, the Canary Islands, French Guiana, Guadeloupe, Madeira, Martinique, Mayotte, Reunion and Saint Martin.

- 5. Schedule 33 The Product Safety and Metrology etc. (Amendment etc.) (EU Exit) Regulations 2019 SI 2019/696.
- 6. EU Implementing Reg 2016/1927 (as retained in UK law) was amended by the 2018 EU Exit Statutory Instrument (SI 2018/1388) details in reg 4 of that Statutory Instrument.
- 7. In practice, few verifiers will have UKAS accreditation by the end of 2021. Until the end of 2022, operators can use a verifier that is applying for UKAS accreditation, providing the verifier is already accredited for the EU MRV regime by a European NAB.
- 8. The requirements laid down in Articles 6 and 7 of Regulation (EU) 2015/757, amended by SI 2018/1388

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