
MARPOL VI, Reg.22A - IMO List of Ships Expected to Submit Fuel Report for 2021

1. Purpose

- 1.1. The purpose of this Technical Alert (TA) is to remind Companies¹ operating ships registered in The Bahamas of the requirement for timely submission of an annual fuel consumption report for each calendar year.
- 1.2. This Alert should be read in conjunction with [BMA Marine Notice 63](#)², Regulations 6.6, 6.7, 22A and Appendices IX and X of Annex VI of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex VI), and International Maritime Organization (IMO) Resolution [MEPC.293\(71\)](#).

2. Application

- 2.1. This Alert applies to all ships of 5,000 gross tonnage and above, including ships that may have been registered with or de-registered from the Bahamas flag during the calendar year for which the fuel consumption data submission is being prepared.
- 2.2. In situations where a ship is under repair or conversion, or in extended lay-up, or remains otherwise out of active operations during the entire year, the requirements of this Alert apply should the ship have consumed and/or bunkered any quantity of fuel during the year.

3. Fuel Consumption Data Submission

- 3.1. The Company shall ensure that fuel consumption data for the previous year for ships to which Regulation 22A of MARPOL Annex VI applies is submitted to the Reporting Organisation by not later than 31 March. The Statement of Compliance required by Regulation 6.7 of MARPOL Annex VI is to be issued by the Reporting Organisation by 31 May each year.

¹ The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Merchant Shipping Act

² <https://www.bahamasmaritime.com/wp-content/uploads/2021/10/MN063-Fuel-Consumption-Data-and-Recording-v1.0.pdf>

- 3.2. When preparing the annual fuel consumption reports for their fleet, the Company should be aware that submission is also required **for a part of a year** if a ship has left or been accepted to their management, joined or left the Bahamas Flag, or has been recycled before 31 December.

4. IMO List of Ships

- 4.1. An Annual Fuel Consumption Report shall be submitted prior to 31 March for the preceding year. A year is counted from 01 January to 31 December, or part thereof as outlined in paragraph 3.2.
- 4.2. To facilitate the identification of ships for which a submission is required, the IMO publishes a list every January of IMO numbers of registered ships for every Administration. The list can be found on the IMO Global Integrated Shipping Information System (GISIS) portal at:
<https://gisis.imo.org/Members/FUEL/ShipsList.aspx>³
- 4.3. For ease of reference the IMO lists of ships required to submit annual fuel consumption data reports in previous years can also be found on GISIS.
- 4.4. A submission should be prepared for each ship on the list by the Company.
- 4.5. Since the list is published early in the year it will not contain the details of ships registered with the Bahamas between the date of publication and 31 December. It is the Company's responsibility to identify such ships and ensure a submission is made timely.

5. Late Submission of the Annual Report

- 5.1. The BMA has received several notifications from Classification Societies, acting as Reporting Organisations⁴, where submission of an individual ship's annual fuel consumption data report cannot be completed in time prior the deadline of 31 March, or review of the submitted data is not completed prior to 31 May, or submission to GISIS could not be effected prior to 30 June.
- 5.2. Recognising that on occasions timely submission or review of aggregated and verified data cannot be completed, the BMA exercises a pragmatic approach in allowing the Reporting Organisation additional time to complete the submission and issue a Statement of Compliance⁵. A request for a conditionally issued short term International Air Pollution Prevention (IAPP) Certificate should be submitted via the

³ Registration is required for free use of the public site

⁴ See Section 5 of BMA Marine Notice 63

⁵ See Section 6.5 of BMA Marine Notice 63

Classification Society by the Company for every ship where any of the limit date(s) in paragraph 6.1 cannot be met. The BMA will consider such requests on a case-by-case basis.

6. Validity

- 6.1. This Technical Alert is valid until further notice.