
MARPOL VI Reg 27 - IMO List of ships expected to submit fuel report for 2023

1. Purpose

- 1.1. The purpose of this Technical Alert 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, 6.8, 27, 28 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.349\(78\)](#).

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 27 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 and the actual submission of data to IMO Global Integrated Shipping Information System (GISIS) database shall be completed by 30 June.

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 above.

- 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 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. The Company is responsible for preparing a timely submission of the fuel consumption data for previous year.

- 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 Bahamas Maritime Authority (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

³ Registration is required for free use of the public site

⁴ See Section 6 of BMA Marine Notice 63

⁵ See Section 7.4 of BMA Marine Notice 63

International Air Pollution Prevention (IAPP) Certificate should be submitted via the Classification Society by the Company for every ship where any of the limit date(s) in paragraph 5.1 above cannot be met. The BMA will consider such requests on a case-by-case basis.

6. Poor CII Rating And its Effect to Fuel Data Submission Process

- 6.1. With reference to provisions of Regulation 28 of MARPOL VI, where a ship may be found rated D for 3 consecutive years, or rated E, the Statement of Compliance shall not be issued to such ships unless a plan of Corrective Actions is duly developed and reflected in the Ship Energy Efficiency Management Plan (SEEMP) Part III and verified and accepted by BMA, or a Recognised Organisation acting on its behalf. See paragraph 21 of [BMA Marine Notice 61](#)⁶ for further details.

7. Validity

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

⁶ <https://www.bahamasmaritime.com/wp-content/uploads/2022/11/MN061-MARPOL-Annex-VI-v1.1.pdf>