Report Task Force Work Package 6 on Guidance on the determination of distance travelled and time spent at sea

Meetings held:

- Kick-off at ECSA Brussels, Nov. 29th 2016.
- Presentation of first results at ESSF Shipping MRV Monitoring subgroup on Dec. 6th 2016 in Brussels.
- Follow-up at DNVGL Hamburg on Jan. 31st 2017.
  Participants not being present were joining by skype or phone conference.

Terms of Reference for Work Package 6 – Guidance on the determination of distance travelled and time spent at sea

1. Within the legal framework for MRV (Shipping MRV Regulation 757/2015 and its Implementing and Delegated Regulations), provide recommendations on guidance and identify, where relevant, best practice on the determination of distance travelled and time spent at sea.
2. Address at least measurement through the water or over ground, the possible consideration of drifting, movements for tank cleaning and interpretation of the term 'berth'.
3. Take into account the earlier work done by the subgroup including the final report of the 'Study on potential impacts of design choices for monitoring, reporting and verification of CO_2 emissions from maritime transport' (PWC study).
4. Organize, if appropriate, a face-to-face meeting to advance the discussions.
5. Submit by 31 January 2017 a report on the findings of the work package in view of agreeing on guidance on the monitoring of fuel consumption at the ESSF MRV monitoring subgroup meeting in February 2017.

Excerpts of working papers:

PWC Presentation Requirement by Article 6 (3) e) and h) i)/iii) MRV Regulation

“Determination and documentation of the distance per voyage

a.) Real distance travelled (voyage distance from the logbook)
b.) Most direct route between port of departure and port of arrival with use of conservative correction factor

and the time spent at sea between the port of departure and the port of arrival over the reporting period “

MEPC 70/WP 1Draft Report of the Marine Environment Protection Committee on its Seventieth Session dated 28 October 2016

The Committee decided that distance travelled will be determined as distance over ground. Earlier drafts (Bahamas) had proposed to measure distance travelled as distance through the water. Furthermore, “hours underway” will be reported instead of previously proposed “berth to berth” terminology.

Final Report of the Marine Environment Protection Committee on its Seventieth Session dated Nov 11 2016

- ***Draft amendments to MARPOL Annex VI***
- 3.33 The Committee considered the final text of the draft amendments to MARPOL Annex VI related to the data collection system for fuel oil consumption of ships, prepared by the drafting group (MEPC 70/WP.6, annex 3) and took the following decisions:
- .1 having considered the date range reference in square brackets in regulation 22 of the draft amendments, it agreed to delete the brackets and retain the text;
- .2 having considered an intervention by the Chair of the Working Group on Air pollution and energy efficiency informing it that the group had agreed to convert the terms "distance travelled from berth to berth" to "distance travelled" and "hours not at berth" to "hours underway" when finalizing the text of the 2016 SEEMP Guidelines (see paragraph 6.10), it agreed to apply the same changes to appendix IX of the draft amendments to Annex VI for harmonization purposes; and

Guidance on determination of “distance travelled” and “time spent at sea” – Legal basis: Annex II (enclosure)

Discussion:

A consensus was expressed by all members to follow the approach decided at IMO’s MEPC 70 where the Committee decided that distance travelled will be determined as distance over ground.

One member provided further reasoning as to why distance through the water should not be considered further. Speed Logs are subject to many factors of uncertainty. Discrepancies of 0.5 knots or more are not uncommon, recalibration would have to be conducted in much more frequent intervals. However, service engineers could be unavailable on a world-wide basis. The lack of precision will result in a blurred vision instead of better data quality.

Data verification of “distance over ground” can be accomplished with greater precision using AIS and similar means.

Since the legal terminology “Hours underway” is matching the language of the Collision Regulations, the participants agreed with Annex II (a) to exclude anchoring. A vessel is “underway” if not berthed or at anchor.

The group discussed various scenarios and concluded:

Should the vessel be adrift (i.e. while waiting for a berth) the distance should be included as the vessel is underway. Even if the main propulsion is temporarily not required, there will be still Auxiliary Generators and Boilers in operation.

Distances made for the purposes of tank cleaning operations should be included as the vessel is underway.

A question arose concerning how ship to ship transfers should be handled while both vessels are adrift. DG CLIMA clarified this case as being covered by the regulations and not considered as a port of call.

Ship to Ship Transfer within defined limits of a Port is considered as a port call.

Unforeseen voyage deviations such as SAR (Search and Rescue), disembarkation of a sick crewmember, etc. should not result in an additional administrative burden for the carrier and verifier. Hence, it is strongly recommended to make such reporting voluntary. Calling a safe port of refuge to enable disembarkation should not be considered as a port of call to be reported under the MRV regime.

Since the EU Regulation stipulates that "time spent at sea" shall be calculated based on port departure and arrival information, the group discussed in what ways to deal with movements within a given port complex. It is recommended to use the arrival at the first berth and the departure of the last berth in a port where cargo operations had been conducted.

Anchorage is excluded from time spent at sea.

Discussions also addressed the proposal to consider the most direct route between port of departure and port of arrival with use of a "conservative correction factor."

One member asked for guidance on how to facilitate reporting for ships that trade on fixed routes (i.e., ferries) and whether multiplying the distance travelled with the number of annual voyages may be used to reduce unnecessary monitoring. It should also be clarified how vessels that are subject to the per-voyage exemption should calculate their time spent at sea and in port should be considered.

Another member agreed with the preceding statement about fixed routes, but noted ship voyages which are under the scope of the regulation and have more than 300 voyages a year are exempted from per voyage monitoring. In addition, two other monitoring parameters (time and distance) are required to be monitored and summed-up in the annual report.

Standard voyage distances and the use of scheduled time between scheduled port of departure and scheduled port of arrival for the monitoring of time spent at sea should be only considered for short fixed voyages such as for ro-ro/ ro-pax vessels. However, the usage of standard short voyages cannot be based exclusively on VTS distance, but distances and time spent at sea could be also subject to many factors as avoiding shallow waters or an ECA transit.

During a trans-ocean transit, a deviation to avoid heavy weather of up to some hundred nautical miles compared to a standard great circle distance is not unlikely.

Another deviation scenario could occur if a vessel is diverted for commercial reasons to another port of destination. It is self-explanatory that the distance already steamed to the initial destination has to be accounted for in addition. An application of a standard distance is not suitable for these scenarios.

Hence, applying a “most direct route” standard distance should be strongly discouraged.

It should be borne in mind that any correction factors have to be defendable and must be justifiable towards the verifier. There is a jeopardy of wrongly estimating distances, either as under or over estimation. It will create uncertainty in comparison to truly measured distances over ground and may result in an uneven, distorted playing field.

An application of standard voyages (or historic voyage data) should be used as an exemption only in order to fill data gaps subject to final approval by the verifier.

The ESSF Shipping MRV Monitoring sub-group has noted that a large variety of unique circumstances can be expected to arise and that it is impractical to comprehensively address the full range of possible scenarios in a guidance document.

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(as Task Force Co-ordinators WP 6)