



Break-out Session for Task Force Maritime

15th Compliance Conference
26 November 2024

Welcome and Introduction

Nektarios Mamitsas and Filippou Filippou

MOHA progress in Greece

Nektarios Mamitsas



MOHA progress in Greece

15th EU ETS COMPLIANCE CONFERENCE - THE ROAD TO 2030
AND BEYOND

26-27 November 2024, Brussels

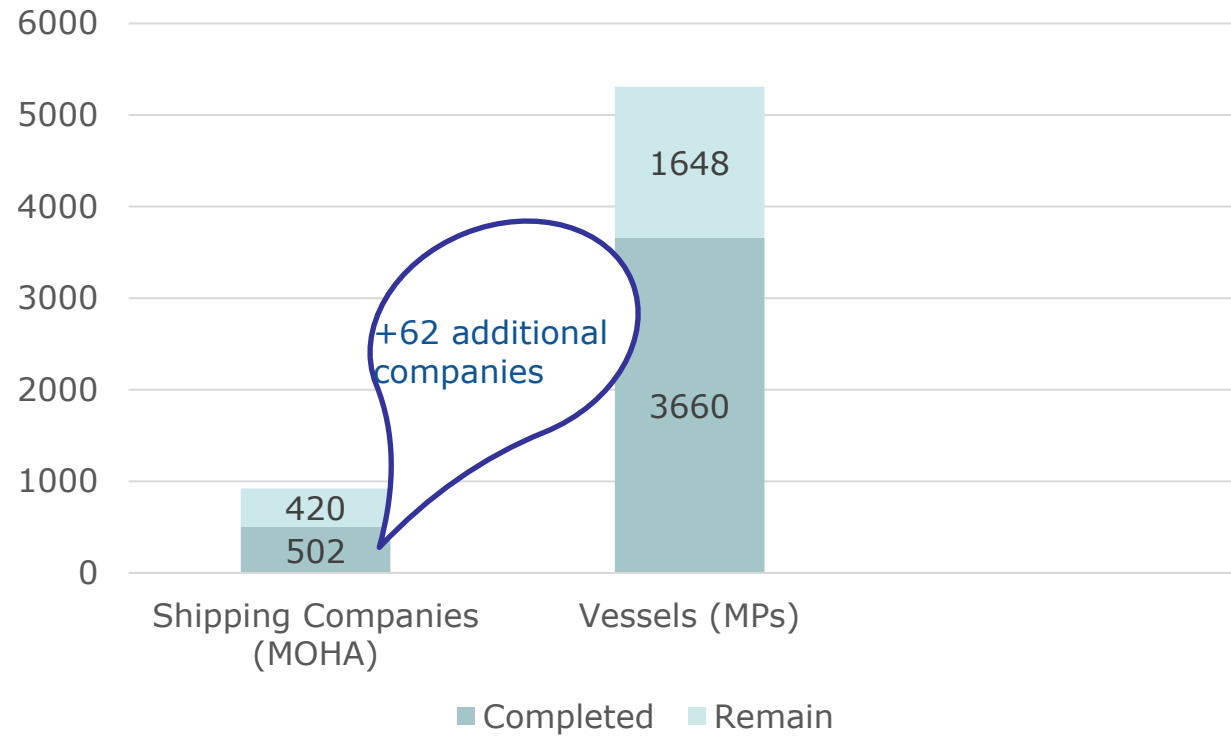


Content

- Current Status (as of 25.11.2024)
- Dealing with non-EU companies
- The role of verifiers in the Greek Union Registry
- Up-to-date documentation in the Greek Union Registry



SHIPPING COMPANIES - VESSELS





Dealing with Non EU companies

- All companies have received email detailing their obligations under MRV/ETS legislation
- Priority must be given to shipping companies operating vessels engaged in falling under the scope of the **EU ETS**
- Special provisions for sanctions targeting non compliant non EU shipping companies
- Port state control authorities involvement

Current Status (II)



VERIFIERS

| Number | Name | Type | Period | Group | Balance | Selected Quantity | EU Dynamic Compliance Status | Swiss Dynamic Compliance Status | Status | Account Holder Name |
|-------------------|---|------------------|--------|-------|---------|-------------------|------------------------------|---------------------------------|--------|---|
| EU-0-5017076-0-42 | VerifAvia (UK) Ltd | Verifier Account | 0 | GR | 0 | 0 | | | Open | VerifAvia (UK) Ltd |
| EU-0-5018182-0-41 | EMICERT LTD | Verifier Account | 0 | GR | 0 | 0 | | | Open | EMICERT LTD |
| EU-0-5018448-0-69 | EUROCERT | Verifier Account | 0 | GR | 0 | 0 | | | Open | EUROCERT AE |
| EU-0-5019215-0-17 | TUV AUSTRIA HELLAS LTD | Verifier Account | 0 | GR | 0 | 0 | | | Open | TUV AUSTRIA HELLAS LTD |
| EU-0-5023000-0-7 | TUV ΕΜΜΑΣ (TUV NORD) A.E. | Verifier Account | 0 | GR | 0 | 0 | | | Open | TUV ΕΜΜΑΣ (TUV NORD) A.E. |
| EU-0-5039092-0-57 | QMSCERT A.E. | Verifier Account | 0 | GR | 0 | 0 | | | Open | QMSCERT A.E. |
| EU-0-5042533-0-21 | BUREAU VERITAS HELLAS M.A.E. | Verifier Account | 0 | GR | 0 | 0 | | | Open | BUREAU VERITAS M.A.E. |
| EU-0-5043073-0-37 | NORMEC VERIFAVIA SAS | Verifier Account | 0 | GR | 0 | 0 | | | Open | VERIFAVIA SAS |
| EU-0-5045797-0-94 | ICS VERIFICATION SERVICES SINGLE MEMBER P.C. | Verifier Account | 0 | GR | 0 | 0 | | | Open | ICS VERIFICATION SERVICES SINGLE MEMBER P.C. |
| EU-0-5047837-0-79 | DROMON BUREAU OF SHIPPING I.K.E. | Verifier Account | 0 | GR | 0 | 0 | | | Open | DROMON BUREAU OF SHIPPING I.K.E. |
| EU-0-5048873-0-40 | LIBERO HELLENIC REGISTER | Verifier Account | 0 | GR | 0 | 0 | | | Open | LIBERO HELLENIC REGISTER |
| EU-0-5051893-0-72 | BUSINESS QUALITY VERIFICATION TESTING INSPECTION AND CERTIFICATION SERVICES PRIVATE COMPANY | Verifier Account | 0 | GR | 0 | 0 | | | Open | BUSINESS QUALITY VERIFICATION TESTING INSPECTION AND CERTIFICATION SERVICES PRIVATE COMPANY |
| EU-0-5052652-0-60 | NIPPON KAIJI KYOKAI | Verifier Account | 0 | GR | 0 | 0 | | | Open | NIPPON KAIJI KYOKAI |
| EU-0-5052653-0-55 | CHINA CLASSIFICATION SOCIETY | Verifier Account | 0 | GR | 0 | 0 | | | Open | CHINA CLASSIFICATION SOCIETY |
| EU-0-5052954-0-5 | RINA HELLAS ΕΤΑΙΡΕΙΑ ΠΕΡΙΟΡΙΣΜΕΝΗΣ ΕΥΘΥΝΗΣ ΝΗΟΤΟΝΟΜΙΑΣ | Verifier Account | 0 | GR | 0 | 0 | | | Open | RINA HELLAS ΕΤΑΙΡΕΙΑ ΠΕΡΙΟΡΙΣΜΕΝΗΣ ΕΥΘΥΝΗΣ ΝΗΟΤΟΝΟΜΙΑΣ |

AMERICAN BUREAU OF SHIPPING HELLENIC SINGLE MEMBER LIMITED LIABILITY COMPANY (ABS HELLENIC S.M. LTD)

Bureau Veritas Certification France
 Bureau Veritas Certification Holding SAS - UK Branch

CHINA CLASSIFICATION SOCIETY

Dromon Bureau of Shipping

EUROCERT S.A

HELLENIC LLOYD'S S.A.

ICS Verification Services Single Member P.C.

Indian Register of Shipping

Korean Register

Korean register of shipping

Lloyd's Register Quality Assurance Ltd

NORMEC VERIFAVIA SAS

Nippon Kaiji Kyokai

Nippon Kaiji Kyokai, Certification Department II

Nippon Kaiji Kyokai, Innovation and Sustainability Department

RINA HELLAS LTD

RINA Services Spa

Swiss Climate EcoCare GmbH

VERIFAVIA (UK) LTD

Phoenix Register of Shipping (PhRS)

Polish Register of Shipping

DNV

DNV GL

EnvService GmbH



The role of verifiers in the Greek Union Registry

- According to article 31 (2) of the Commission Delegated Regulation (EU) 2019/1122 as amended, «The national administrator, the competent authority or, upon decision of the competent authority, the account holder or the verifier shall enter emissions data for the previous year.»
- According to paragraph 5 of the same article, “The emissions approved in accordance with paragraph 4 shall be marked as ‘verified’ in the Union Registry by the national administrator or the competent authority. The competent authority may decide that instead of the national administrator, the verifier shall be responsible for marking emissions as ‘verified’ in the Union Registry. All approved emissions shall be marked verified by the deadlines set in article 32.”



Up-to-date documentation in the Greek Union Registry

- According to Annex VIIa of the Commission Delegated Regulation EU) 2019/1122 as amended, for **registered owners**: "...the shipowner shall provide a document listing the ships under its responsibility, as well as their respective IMO ship identification number. In case of changes to that list of ships, the shipowner shall inform the national administrator within 20 working days and provide it with an updated document, as well as with the name and IMO unique company and registered owner identification number of the new shipping company for each of the ships no longer under the shipowner's responsibility."
- According to article 22(1) of the Commission Delegated Regulation EU) 2019/1122 as amended, for **ISM companies**: "All account holders shall notify the national administrator within 10 working days of changes to the account information."



Thank you!

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15th Compliance Conference

Union registry practices

Filippos Filippou

Union registry practices

break out session

15th Compliance Conference

agenda

Introduction – High level of procedure

Implementation for non-EU companies

Mandate agreements – Vessels under management

Additional issues

Procedure of registration

- Shipping companies contact (via e-mail) the National Administrator (DoE)
- Template instruction message sent from our side with instructions
- Documents (in line with 2019/1122) are prepared and send via e-mail for first inspection by DoE
- With our approval, physical documents are sent to our offices
- Final check and creation of online account

For non-Eu companies

In accordance with 2019/1122

- All company related documentation
- Group structure which is signed by Directors of shipping company
- All mandate agreements in accordance with 2023/2599
- Authorised representative documentation (Apostilled)

Company requirements in non-EU countries

- Non-EU companies might not have all required documents
- Case by case basis applied regarding company documentation
- Authorised Representative documentation – requirements same as all accounts

Difficulties of non-eu companies

- No affiliation with Cypriot organisations
- Contact with shipping companies only possible through THETIS information
- No information available outside THETIS
- Equasis for information on vessels

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Mandate agreements

1. In accordance with implementing regulation 2023/2599
2. Agreements with bareboat charters included are accepted (tripartite) – must include ship owning & ISM companies
3. Original mandates filed with rest of documents
4. New mandates accepted to keep account up to date
5. Difficulty in maintaining the vessels of accounts up to date in Union Registry
6. Checks with THETIS platform (vessels of the shipping company)

Additional Issues – Possible solutions

- Data in THETIS might appear outdated (changes of names of ship owning companies)
- THETIS and Union Registry platforms should not be connected – could include functions to download files from both platforms to keep track of shipping companies and respective vessels
- Authorised Representatives difficulties using platform (language barriers)
- Increase of helpdesk requests



**Thank
you**

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15th Compliance Conference

Intervention

Spain, Germany

Roundtable Discussion

Additional issues & workplan 2025

Nektarios Mamitsas and Filippos Filippou

Thank you for your attention