



**The Bahamas
Shipowners Association**

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CONSULTATION ON THE REVISION OF THE POLICY ON MONITORING, REPORTING AND VERIFICATION OF CO₂ EMISSIONS FROM MARITIME TRANSPORT

The Bahamas Shipowners Association (BSA) represents the shipowners of the world's 6th largest Register, representing shipowners and operators in all parts of the world.

The BSA would like to make the following comments on the second phase of the European Commission's consultation on the revision of the policy on monitoring, reporting and verification of CO₂ emissions from maritime transport. The below should be viewed as an addition to the answers we have provided to the questionnaire – which, if read in isolation could potentially be taken out of context.

The BSA wishes to emphasise that it strongly supports a **full alignment** of Regulation (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport (the MRV regulation) with the IMO data collection system (DCS).

It is of utter importance that a full alignment with the IMO DCS will make submission of separate data to the EU system unnecessary. Requiring ship operators to manage two distinct and separate reporting systems collecting the same data will add additional costs and administrative burdens though not achieving any general benefit, may potentially undermine support among non-EU Member States for making further progress at IMO on the development of further CO₂ reduction measures.

As is clear from the Recital 34 and Article 22.3 of the MRV Regulation commit the European Commission to reviewing Regulation (EU) 2015/757 and, if appropriate, to proposing amendments to align it with a global reporting system. This has also been made clear to BSA during meetings with representatives of the European Commission, most recently in July this year.

The BSA understands that the objectives of the EU may be different from what the EU MRV Regulation aims to achieve, as distinct from the objectives of the IMO DCS. The BSA does not fully agree with such objectives of the EU, and the decision by the IMO to develop an IMO GHG Strategy, includes a list of candidate CO₂ reduction measures, providing EU Member States with the possibility to achieve these objectives at the global level.

The Commission will be aware that during the discussions at IMO, to which the International Chamber of Shipping (ICS) has not opposed any of the candidate measures that have so far been proposed from being included in the list that should go forward as part of the initial strategy to be adopted by IMO Member States in April 2018, so that these can be given detailed consideration by IMO Member States as soon as possible. The BSA is a member of the ICS and as such is a very active role in discussions on the reduction of GHG emissions from shipping, and as such is fully supporting the ICS position.

Further, the BSA fully agrees with the ICS asserting that the IMO DCS is indeed an appropriate global reporting system. A full alignment of the EU MRV Regulation with the IMO DCS will therefore demonstrate the EU's continuing commitment to working with all IMO Member States towards a global solution for reducing GHG emissions from international shipping. This is particularly important as IMO develops, with the full support of EU Member States, its initial IMO Strategy for the reduction of GHG emissions, for adoption by MEPC 72 in April 2018.

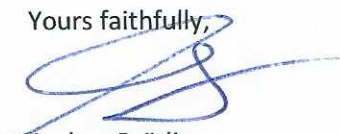
It was well noted by the BSA that many non-EU Member States supported the adoption of the IMO DCS on the clear understanding that the EU would then align its regional system with what has been agreed for global application. A crucial element of this understanding was that any data collected from individual ships would be anonymised.

It is the understanding of the BSA that a full alignment of the EU and IMO systems would be well-received by non-EU Member States as clear evidence of the EU wishing to honour an implicit commitment to accept what has been agreed by IMO for global application. Significantly, this will support facilitation of a global agreement on an ambitious IMO GHG reduction strategy embracing additional candidate measures, including further CO₂ reduction measures to be implemented globally in the short term, before 2023.

Based on the above, the BSA requests the European Commission undertake a **full alignment** with the IMO DCS in order to demonstrate its confidence in the work of IMO and in the interests of promoting further co-operation on the reduction of GHG emissions at the global level.

With regard to the questionnaire, the BSA is fully supportive of the comments made by the ICS to the European Commission in its letter dated 13 November 2017 as part of above mentioned Consultation. The BSA has responded to the questionnaire in a similar fashion to the ICS.

Yours faithfully,



Anders Brødje
Manager