

WP 8 - Guidance on monitoring methods for ships using the exemption from per-voyage monitoring

Recommendation

1. Introduction - Legal background

Application of *Article 9(2)* of the EU MRV Regulation.

This exemption would be given without prejudice to Article 10 i.e. monitoring on an annual basis “in accordance with **Part A of Annex I** and with **Part B of Annex II**.”

2. From previous discussions within other WPs (mainly 5 & 6)

*a) Determination of **distance travelled and time spent at sea***

- Use of standard distance considering routing elements such as avoiding shallow waters or an ECA transit
- Annual distance travelled: multiplying the distance travelled with the number of annual voyages (calculation per standard route and subsequent aggregation)
- Time spent at sea: use of scheduled time between scheduled port departure and scheduled port arrival
- Annual time spent at sea: multiplying the scheduled travel time with the number of annual voyages (calculation per standard route and subsequent aggregation)

*b) Determination of **cargo carried and transport work***

- Deviation from per-voyage monitoring possible in case of single standard routes (cargo and distance to be multiplied to calculate transport work)
- Use of commercial documents with aggregated cargo figures (either total annual or per standard route)

*c) Determination of **fuel consumption and CO₂ emissions***

- Fuel monitoring and recording should be carried out at the beginning of the monitoring period and at the end of the monitoring period for each fuel type and/or each storage tank and upon bunkering and de-bunkering.
- Companies may follow more frequent intervals according to their internal procedures.
- Fuel consumption (and subsequently CO₂ emissions) in ports may be calculated by multiplying the estimated hourly consumption while the ship is at berth with the average time spent at berth and the number of annual voyages.

3. Technical Question to be answered

How will exempted ships report annually Article 10 figures? Are there any differences to the per-voyage monitoring in need of being identified?

4. Findings and Recommendation

Having in mind the outcome of the discussions held during the past meetings and comments recently received, one could conclude that the difficulty will remain for the calculation of the annual/total transport-work and consequently the two average energy efficiency indicators on which the total transport-work is included. The correct and meaningful calculation of these annual values would only be possible if the aggregation continues to be based on the sum of all the parcels i.e. voyage-specific transport-work values.

Therefore, *unless all the performed voyages are of the exact same length, the need of having a parcel calculation (per-voyage monitoring derived) to obtain the annual reporting value will still remain.*