The first milestone in the EU MRV regime was passed on 31 August regarding when companies should submit their MRV monitoring plans for verification. As we are now entering the next stage of the EU MRV regulations, DNV GL would like to share some perspectives on effective implementation with you.

The overall ambition with the EU MRV regime is to reduce greenhouse gas emissions within the EU. Emission data collection per ship shall commence on 1 January 2018 - based on the approved monitoring plans - while verification will start in early 2019. Some concrete recommendations when going forward:

31 August is not the end
The deadline for submitting the MRV monitoring plan for verification by an accredited verifier was 31 August 2017. DNV GL, and other accredited verifiers, have up to 31 December 2017 to verify the monitoring plans.

Confirmation of receipt
Our customers will receive a message as acknowledgement of receipt when sending the MRV monitoring plans via the MRV monitoring plan app and as an email to mrv@dnvgl.com. Or, it can be checked in the app at every moment. Some customers have also asked for an official letter from DNV GL as confirmation of receipt, and it will take some time before receipt is sent.

Approved monitoring plans
When the monitoring plans have been verified by DNV GL (by 31 December 2017), the customer will receive a Statement of Compliance.

The MRV plan generator app
The app is an electronic template according the requirements of the Commission Implementing Regulation (EU) 2016/1927. Procedures, measurement methods, etc., are selected by the user and adapted to the existing management system of the ship operator. Only general ship data is predefined by external sources but still need to be checked. For ships that have still not submitted monitoring plans for verification, we recommend you thoroughly check the correctness of this information for the relevant vessel.

Even though the large majority of the monitoring plans we have received for verification are of acceptable quality, some are missing required information that makes the verification challenging, e.g. reference to management procedures, responsibilities, assessment of accuracy of measurements, etc.
One review of submitted MRV Monitoring Plan
DNV GL will do one free-of-charge review of the monitoring plan. To ensure an effective process, we recommend for our customers to get one plan (for one ship) - a “masterplan” – verified before sending us plans for the whole fleet.

Emission reports
The vessel emission report based on log abstract data needs to be transferred electronically to DNV GL as per the DNV GL standard interface description (will be detailed and communicated in due course).

Alignment towards IMO’s DCS (Data Collection System) scheme
Both DNV GL and the industry expects the EU MRV and IMO DCS to be aligned in the future, but most likely the two schemes will be applicable in parallel for a certain number of years. It is too early, however, to specify the details and practical implications of having two similar but not identical regimes during this period. The IMO DCS comes into force on 1 January 2019.

Recommendations
We recommend for all of our customers take action early on, already in 2017, to establish processes for data collection from ships. This will give you time to take corrective actions in case of compliance with the regulations and requirements.

References
- DNV GL web pages on the EU MRV Regulation
- DNV GL Technical and Regulatory News: Preparing for the MRV regulation (September, 2016)
- On-demand webinar and slide deck: EU MRV - Latest regulatory update (July, 2017)

CONTACT
For further information, please contact your local DNV GL office or your account manager.