



Marine Circular Nr. 03/2025, 20/05/2025

Subject: “Amendments to the EU MRV (Monitoring, Reporting and Verification) Regulation - Extension to Ships of 400 gt and above and the EU ETS (EU Emission Trading System) Directive”.

References:

- a. Marine Circular No. 11/2022, dated 08/12/2022.
- b. Regulation (EU) 2015/757 as amended by Regulation (EU) 2023/957.
- c. Directive (EU) 2003/87/EC as amended by Directive (EU) 2023/959.

To: Shipowners/Operators, Legal Representatives of G-B I.S.R. flagged Vessels, Deputy Registrars Authorized Offices, Recognized Organizations (ROs), relevant stakeholders, and Seafarers on board G-B flagged vessels.

Summary: This Marine Circular provides guidance on the recent amendments to the EU Monitoring, Reporting and Verification (MRV) Regulation and the EU Emissions Trading System (EU ETS) Directive, which introduce significant compliance obligations for vessels of 400 gross tonnage and above. As of 1 January 2025, general cargo and offshore vessels in this category are now subject to the extended MRV requirements, including the mandatory verification of Monitoring Plans, emissions reporting for CO₂, CH₄, and N₂O, and eventual integration into the EU ETS framework. All G-B I.S.R. registered operators and stakeholders are required to ensure timely alignment with these obligations and are urged to cooperate promptly with accredited verifiers to avoid penalties or operational restrictions within the EEA.

1. Purpose: This Marine Circular serves to inform stakeholders regarding the amendments: EU MRV Extended to Ships 400 GT and Above, and the EU ETS Collection System for the Shipping Sector. Effective 1 January 2025, the amended EU MRV regulations have been extended to general cargo vessels with a gross tonnage (GT) ranging from 400 to 5,000 and offshore vessels of 400 GT and above.

2. Applicability: This Circular is applicable to vessels registered under the Guinea-Bissau International Ships Registry (G-B I.S.R.) with a gross tonnage of 400 and above, falling within the scope of the concrete EU legislative requirements.

3. Expansion of EU MRV Regulations and Integration with EU ETS

3.1 Effective 1 January 2025, the amended European Union Monitoring, Reporting, and Verification (EU MRV) regulations extended their scope to encompass general cargo vessels with a gross tonnage (GT) between 400 and 5,000, and offshore vessels of 400 GT and above.

3.2 The overarching objective of the EU MRV emissions collection and reporting framework is to evaluate the environmental impact of maritime transport and to provide a foundation for the EU Emissions Trading System (ETS) and Fuel EU Maritime regulations.



4. EU MRV – An Overview

4.1 The EU MRV regulation establishes mandatory protocols for shipping companies to annually report, and for accredited independent verifiers to validate, the reported quantities of carbon dioxide (CO₂) emissions and other pertinent information from vessels calling at European Economic Area (EEA) ports.

4.2 In 2023, as part of a comprehensive suite of measures aimed at reducing emissions from the maritime transport sector, the MRV regulation was revised. Subsequent to 1 January 2024, the scope of the MRV regulation has broadened, extending beyond CO₂ emissions to include methane (CH₄) and nitrous oxide (N₂O) emissions from shipping.

4.3 Furthermore, commencing 1 January 2025, the amended EU MRV regulations will also apply to general cargo vessels within the 400 to 5,000 GT range and offshore vessels of 400 GT and above.

5. EU MRV Requirements

5.1 Monitoring Plan (MP). Following the EU MRV regulation, a vessel's Monitoring Plan (MP) must undergo verification by an independent and accredited verifier. The content of the MP is prescribed by the EU MRV regulation, detailing the methodology employed for monitoring and reporting emissions.

5.2 Emissions Report. The Emissions Report shall contain detailed information concerning fuel consumption, voyage distance, and cargo carried on voyages to, between, and from EU ports.

5.3 Document of Compliance (DoC). Upon submission of the aggregated Emissions Report, the Verifier shall perform a validation against voyage log abstract data, bunkering data, and external data sources. The verified Emissions Report for a given year must be submitted by the shipping company to the European Commission by 31 March of the subsequent year. The Document of Compliance (DoC) for the Emissions Report must be downloaded by the shipping company from the EU's THETIS-MRV and maintained onboard by 30 June.

5.4 EU ETS applicable greenhouse gas emissions on an annual basis. Failure to comply will result in penalties, including fines and port entry bans within EEA territories.

6. Integration of EU MRV and EU ETS

6.1 The EU MRV and EU ETS are now integrated, with emissions data from the EU MRV serving as the foundation for the EU ETS. While the EU ETS is not yet mandatory for vessels below 5,000 GT, general cargo and offshore vessels within the 400 to 5,000 GT range are anticipated to be included from 2027.

6.2 Commencing in 2025, shipping companies must submit verified aggregated emissions data at the company level to the administering authority by 31 March of each year, based on the prior year's MRV Emissions Reports. This necessitates the verification and submission of the ship's Emissions Report one month earlier than under the current MRV system.

6.3 Following successful fleet verification, MRV Emissions Reports and the Company Emission Verification Report, encompassing all fleet EU ETS emissions, must be submitted to the administering authority by 31 March each year.



6.4 While the EU MRV initially served as a data collection compliance regulation, its implications extend beyond data collection, with significant financial consequences for inaccurate reporting.

7. Compliance Responsibilities for G-B I.S.R. Vessels, Ship Operators, and Owners

7.1 The International Ships Registry of Guinea-Bissau mandates that all operators and owners of vessels of 400 GT and above, registered with this administration and subject to these requirements, must comply and engage an accredited independent Verifier for EU MRV Verification without delay.

7.2 Shipping companies with vessels falling within the scope of the amended EU MRV Regulation are strongly advised to cooperate as early as possible with accredited independent verifiers, if they have not already done so. Early engagement will support timely verification of Monitoring Plans, ensure proper implementation of emission data collection procedures in accordance with the applicable requirements, and facilitate compliance with both the EU MRV and the evolving EU ETS obligations. Proactive cooperation will help prevent potential delays, administrative complications, and the risk of non-compliance as the regulatory framework continues to expand.

8. Consequences Resulting from Non-Compliance

8.1 Non-compliance with the aforementioned requirements may result in the suspension or revocation of the vessel's registration certificates, and/or the imposition of disciplinary measures as deemed necessary by the International Ships Registry of Guinea-Bissau.

9. Effective Date

9.1 This Marine Circular is effective immediately upon issuance.

10. Enquiries

10.1 For further clarification, please contact: G-B I.S.R Technical Department, Email: tech@gbi-lb.org, Tel.: +30 210 4537950, +30 210 4537194

For the Guinea-Bissau International Ships Registry

Authorized Signatory:

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