



Ship Energy Efficiency Management Plan
(SEEMP) Part II:

Ship Fuel Oil Consumption Data Collection Plan

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IMO No. 9446192

DROMON BUREAU OF SHIPPING SHIP ENERGY EFFICIENCY MANAGEMENT PLAN PART II	
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THE SEEMP PART II HAS BEEN EXAMINED AND FOUND IN COMPLIANCE WITH THE REQUIREMENT OF REGULATION 26 OF MARPOL ANNEX VI.	
APPROVED ON BEHALF OF FLAG ADMIN:	PANAMA
DATE:	03/07/2024
APPROVAL NO:	2407019FCoC
SIGNATURE:	 

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1 Record of revision of Fuel Oil Consumption Data Collection Plan

Date of revision	Revised provision
22 MAY 2024	Ver. 01

2 Company Information

Company Information	
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3 Ship particulars

Ship particulars	
Ship name	AKSON MEISA
IMO number	9446192
Call sign	3E4786
Port of registry	PANAMA
Flag	PANAMA
Ship type	Bulk Carrier
Keel Laid	2009
Gross tonnage	32983
Net tonnage	19191
Deadweight	56956
Energy Efficiency Design Index (if applicable)	N/A
Ice class (if applicable)	N/A

4 Introduction

1. The SEEMP Part II has been developed in accordance with the standards described in MARPOL Annex VI, as amended by Resolution MEPC.278(70), Chapter 4: Regulations on Energy Efficiency for Ships, Regulations 22.2 and 22A.
2. The SEEMP Part II has been developed taking into account the information contained in Resolution MEPC.282(70) – 2016 Guidelines for the Development of a SEEMP – as identified by the IMO.
3. Data collected for the current calendar year shall be readily accessible for at least one year from the end of the current calendar year and shall be made available to the Administration or any organisation duly authorised by it upon request, as required by MARPOL Annex VI, Chapter 4, Regulation 22A.8.
4. The purpose of the plan is to develop a ship-specific method to collect, aggregate and report ship data with regard to annual fuel oil consumption, distance travelled, hours underway, and other data required by Regulation 22A of MARPOL Annex VI to be reported to the Administration or any organisation duly authorised by it.
5. Pursuant to Regulation 5.4.5 of MARPOL Annex VI, the Administration shall ensure that the ship's SEEMP complies with Regulation 22.2 of MARPOL Annex VI prior to collecting any data.
6. The plan has been reviewed by RO on behalf of the Flag Administration and no alteration or revision shall be made to any part of it without the prior approval of the Administration or RO.

5 Scope

1. Each ship of 5,000 GT and above shall have on board a ship fuel oil consumption data collection plan describing the methodology that will be used to collect the data required by Regulation 22A.1 of MARPOL Annex VI and the processes that will be used to report the data to the ship's Administration or any organisation duly authorised by it.
2. A copy of the approved data collection plan shall be provided on board and this shall be done prior to collecting data under Regulation 22A of MARPOL Annex VI in order to ensure the methodology and processes are in place prior to the beginning of the ship's first reporting period.

6 Objectives

1. The data collection plan contains the following information:
2. Description of the method used to measure annual fuel oil consumption.

3. Description of the method used to measure distance travelled.
4. Description of the method used to measure hours underway.
5. Description of the method used to aggregate data.
6. Description of the data quality control measures.
7. Description of the processes that will be used to report the data.

7 Methodology for collecting data on fuel oil consumption

Fuel oil means any fuel delivered to and intended for combustion purposes for propulsion or operation on board a ship, including gas, distillate, and residual fuels.

Fuel oil consumption shall include all the fuel oil consumed on board – including but not limited to the fuel oil consumed by the main engines, auxiliary engines, gas turbines, boilers, and inert gas generator – for each type of fuel oil consumed, regardless of whether a ship is underway or not.

The types of fuel as defined in Resolution MEPC.245(66), as amended, are shown in Appendix A.

If fuel oils are used that do not fall into one of the categories as described in Resolution MEPC.245(66), as amended, and have no CF (a non-dimensional conversion factor between fuel oil consumption and CO₂ emission) assigned, the fuel oil supplier should provide a CF for the respective product supported by documentary evidence.

The annual total amount of CO₂ is calculated by multiplying annual fuel oil consumption and CF for the type of fuel.

7.1 Ship engines and other fuel oil consumers and fuel oil types used

Engines or other fuel oil consumers		Type and model (Serial number)	Power KW (MCR)	Fuel oil types	YOI
M/E		STX MAN B&W 6S50MC-C S/N: SB6S50-7159	9,480 at 127 rpm	Heavy Fuel Oil(HFO), Light Fuel Oil (LFO), Marine Diesel Oil (MDO), Marine Gas Oil (MGO)	2010
A/E No 1		YANMAR 6EY18AL 0498FXH	660 at 900 rpm	Heavy Fuel Oil(HFO), Light Fuel Oil (LFO), Marine Diesel Oil (MDO), Marine Gas Oil (MGO)	2010
A/E No 2		YANMAR 6EY18AL 0499FXH	660 at 900 rpm	Heavy Fuel Oil(HFO), Light Fuel Oil (LFO), Marine Diesel Oil (MDO), Marine Gas Oil (MGO)	2010
A/E No 3		YANMAR 6EY18AL 0500FXH	660 at 900 rpm	Heavy Fuel Oil(HFO), Light Fuel Oil (LFO), Marine Diesel Oil (MDO), Marine Gas Oil (MGO)	2010
Aux. Boiler	Oil side	Vertical Tube Smoke Boiler	WP 0.7 MP evaporation rate 1500 gk/h	Heavy Fuel Oil(HFO), Light Fuel Oil (LFO), Marine Diesel Oil (MDO), Marine Gas Oil (MGO)	2010
	Exh. side	AALBORG MISSION™ OC Boiler No. 19424	WP 0.7 MP evaporation rate 1000 gk/h		2010

7.2 Emission factor

CF is a non-dimensional conversion factor between fuel oil consumption and CO₂ emission in the 2014 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships (resolution MEPC.245(66)), as amended. The annual total amount of CO₂ is calculated by multiplying annual fuel oil consumption and CF for the type of fuel.

(See Appendix I)

7.3 Method using bunker delivery notes (BDNs)

Description

This method determines the annual total amount of fuel oil used based on BDNs, which are a requirement for fuel oil delivered to and used on board a ship for combustion purposes in accordance with Regulation 18 of MARPOL Annex VI.

BDNs are required to be retained on board for three years after the fuel oil has been delivered.

Calculations regarding the annual oil consumption are done by the responsible person on board, using the total mass of fuel oil on board the vessel as reflected in the BDNs plus the difference between the amount of remaining tank oil before and after the reporting period.

To calculate the difference between the amount of remaining tank oil before and after the reporting period, the tank reading is carried out at the beginning and the end as outline below:

- a. on 1st of January, readings of tanks containing each type of fuel oil will be taken through soundings. These readings will be verified by the responsible person and recorded and retained on board.
- b. Where a voyage starts before 1st of January and ends after 1st of January, readings for tanks containing each type of fuel oil will be taken at the port of departure and at the port of arrival of the voyage. A statistical method of rolling average using voyage days will be used to determine the tank readings on 1st of January. These readings will be verified by the responsible person and recorded in oil record book and retained on board.
- c. On 31st of December, readings for tanks containing each type of fuel oil will be taken through soundings. These readings will be verified by the responsible person and recorded in oil record book and retained on board.
- d. Where a voyage starts before 31st of December and ends after 31st of December, readings for tanks containing each type of fuel oil will be taken at the port of departure and at the port of arrival of the voyage. A statistical method of rolling average using voyage days will be used to determine the tank readings on 31st December. These readings will be verified by the responsible person and recorded in the oil record book and retained on board.

In case of fuel oil offloaded then the amount of the oil offloaded should be subtracted from the fuel oil consumption of the reporting period. This amount should be based on the records of the ship's oil record book.

The measurements regarding the tank readings, bunkering and de-bunkering are recorded in oil record book, Noon report, Arrival & Departure report and in Bunker Calculation form. The reports along with the BDNs are transmitted to the company's head office through an electronic communication, as soon as practicable.

Before bunkering operations are commenced the responsible person on board must carry out sounding of all tanks on board the ship, correcting for trim. The correction for trim is carried out based on the sounding tables of fuel oil tanks. The final amount of fuel received on board the ship is cross checked with the Bunker Delivery Note (BDN).

Possible discrepancies (if more than 2% difference) between the BDN and the ship's fuel measurement are brought to the supplier's attention before signing the BDN. If a discrepancy cannot be reconciled, the ship issues a Letter of Protest before signing the BDN and sends the Letter of Protest together with the BDN to the office for further processing. In such a case, for the recording of data, the responsible person shall take into account the actual fuel as measured and recorded on board the ship. Copies of these documents are also maintained on board for at least three (3) years.

In case of any corrections regarding density, temperature, if applied, should be documented.

Bunker Quantity

$$\text{Mass} = \text{Volume} \times \text{Density}$$

Metric Tonnes and Density

Density values to be used are those originated from BDN. Source of density values is stated always. However, the fuel oil volumes recorded onboard after each monitoring are always be related to the standard temperature of 15°C.

$$\text{Metric Tonnes} = (\text{Actual Sounder Volume}) \times (\text{Temperature Corrected Density})$$

$$\text{Temperature Corrected Density is} = (\text{Density of Fuel Oil @ } 15^{\circ}\text{C}) \times \{1 - [(T-15) \times 0.00064]\}$$

Where:

T = temperature of oil in bunker tanks in degree Celsius, 0.00064 = Correction factor

To cater for most practical handling onboard with the density issue -as an alternative to above- volume to mass conversion can be done using standard conversion factors. The company uses the following standard conversion factors:

0.96 when using RME180, RMG 180/380/500/700 or RMK 380/500/700

0.88 when using MGO/MDO

These standard conversion factors derive from ISO 8217 Fuel Standard figures after having been corrected with ASTM D1250 density temperature variation tables (using 60°C-80°C for IFO/HFO and 40°C for MDO/MGO) and apply regardless of whether the volume measurements are made in the bunker tanks.

Density for Commingled bunkers

When there are 2 types of fuels (or more) are mixed and stored in one fuel tank then the density volume to mass conversion factor of the fuel tank of the mixed oil is calculated as per the below mentioned formula:

$$[(\text{Fuel Volume(A)} \times \text{Density(A)}) + (\text{Fuel Volume(B)} \times \text{Density(B)})] / (\text{Fuel Volume(A)} + \text{Fuel Volume(B)}) = \text{mixed fuel Density}$$

Density for blended fuels

In the rare event that fuel types with different densities are blended in a tank, the weighted average density is determined, unless a density analysis of the mixed fuel sample is available.

$$P_w = [(P_{add} \times M_{add}) / M_{total}] + [(P_{exist} \times M_{exist}) / M_{total}]$$

Where:

P_w : is the weighted average density of fuel in the tank after additions $[t/m^3]$

P_{add} : is the density of the fuel added to the tank $[t/m^3]$

M_{add} : is the amount of fuel added to the tank $[t]$

M_{total} : is the total amount of fuel in the tank after addition $[t]$

P_{exist} : is the density of the existing fuel in the tank before addition $[t/m^3]$

M_{exist} : is the existing amount of fuel in the tank before addition $[t]$

Procedure

The following table sets out how the ship will implement the summation of BDN information and conduct tank readings.

Procedures	Responsible person(s)	Ref. Of Procedure	Version of existing Procedure	IT System Used	Equipment
<p>Determining the amount of remaining tank fuel oil at the beginning of the reporting period.</p> <p><i>For example: On 1 January, readings for tanks containing each type of fuel oil will be taken through soundings. These readings will be verified by the responsible person and recorded and retained on board.]</i></p>	[Chief Engineer /Master]	N/A	N/A	Microsoft Excel	<p>[Type/model of measurement equipment involved.</p> <p><i>For example: Electronic sounding devices for No 1 HFO tank, No 2 HFO tank, No 1 MDO tank, and No 2 MDO tank. Sounding rods for No 3 HFO tank, No 4 HFO tank, No 5 HFO tank, and No 6 HFO tank. Level gauges for HFO day tanks, etc.]</i></p>
[Determining the amount of remaining tank fuel oil at the beginning of the reporting period in the event that a voyage	[Chief Engineer/ Master]	N/A	N/A	Microsoft Excel	[Type/model of measurement equipment involved.

<p>extends across the reporting period.</p> <p><i>For example: Where a voyage starts before 1 January and ends after 1 January, readings for tanks containing each type of fuel oil will be taken at the port of departure and at the port of arrival of the voyage. A statistical method such as a rolling average using voyage days will be used to determine the tank readings on 1 January. These readings will be verified by the responsible person and recorded and retained on board.]</i></p>					<p><i>For example: Electronic sounding devices for No 1 HFO tank, No 2 HFO tank, No 1 MDO tank, and No 2 MDO tank. Sounding rods for No 3 HFO tank, No 4 HFO tank, No 5 HFO tank, and No 6 HFO tank. Level gauges for HFO day tanks, etc.]</i></p>
<p>[Determining the total number of BDNs received during the reporting period.</p> <p><i>For example: From 1 January to 31 December, all BDNs received will be verified by the responsible person and retained on board.]</i></p>	[Chief Engineer / Master]	N/A	N/A	Microsoft Excel	
<p>[Determining the total amount of fuel oil offloaded during the reporting period.</p> <p><i>For example: From 1 January to 31 December, all fuel oil that is offloaded will be recorded on the oil record book. The book will be verified by the responsible person</i></p>	[Chief Engineer /Master]	N/A	N/A	Microsoft Excel	

<i>and retained on board.]</i>					
<p>[Determining the amount of remaining tank fuel oil at the end of the reporting period.</p> <p><i>For example: On 31 December, readings for tanks containing each type of fuel oil will be taken through soundings. These readings will be verified by the responsible person and recorded and retained on board.]</i></p>	[Chief Engineer /Master]	N/A	N/A	Microsoft Excel	[Type/model of measurement equipment involved.
<p>[Determining the amount of remaining tank fuel oil at the end of the reporting period in the event that a voyage extends across the reporting period.</p> <p><i>For example: Where a voyage starts before 31 December and ends after 31 December, readings for tanks containing each type of fuel oil will be taken at the port of departure and at the port of arrival of the voyage. A statistical method such as a rolling average using voyage days will be used to determine the tank readings on 31 December. These readings will be verified by the responsible person and recorded and retained on board.]</i></p>	[Chief Engineer /Master]	N/A	N/A	Microsoft Excel	[Type/model of measurement equipment involved.
[Calculating annual fuel oil consumption for the reporting period.]	[Chief Engineer / Master /shore office]	N/A	N/A	Microsoft Excel	

<p><i>For example: After 31 December and within three months, the annual fuel oil consumption will be calculated by:</i></p> $(P1 \text{ or } P2) + P3 - P4 - (P5 \text{ or } P6)$ <p><i>P# stands for the procedure number.</i></p> <p><i>This will be the total mass of fuel oil used on board the vessel in metric tonnes for the calendar year.]</i></p>					
[Any correction, e.g. densities and temperatures used for calculating mass from volume derived from tank readings/soundings, shall be documented.]	[Chief Engineer / Master / shore office]	N/A	N/A	Microsoft Excel	
[Any supplemental data used for closing an identified difference in bunker quantity shall be supported with documentary evidence.]	[Chief Engineer / Master/ shore office]	N/A	N/A	Microsoft Excel	

7.4 Measurement instruments involved

No	Measurement Equipment	Elements applied to	Fuel type used	Technical description Maintenance intervals
1	Sounding dip tape	All HFO D/G oil tanks	Heavy Fuel Oil(HFO), Light Fuel Oil (LFO), Marine Diesel Oil (MDO), Marine Gas Oil (MGO)	Material: Stainless Steel Maintenance intervals: After use Specification: 20 mm x 15 m (W x L)

7.5 Method to measure distance travelled

Description

The distances travelled over ground while the ship is underway under its own propulsion is obtained from GPS and then is recorded in Bridge Log Book in accordance with SOLAS regulation V/28.1, in Arrival Reports and Passage Plan in nautical miles. These reports are transmitted to the company's head office through an electronic communication, as soon as practicable.

after 31st of December and within three months, the annual distance travelled will be calculated by adding up all the daily distance travelled values from 1st of January to 31st of December. This will be the total distance travelled over ground in nautical miles for the calendar year.

Responsible person	On board	Ashore	Ref. Of Procedure	Version of existing Prcedure	IT System Used
	Master	Superintendent Engineer, Operations Dept, DPA	N/A	N/A	Microsoft Excel

7.6 Method to measure hours underway

Description

The hours underway are obtained from the total amount of time spent at sea (berth-to-berth) over each period under its own propulsion and is recorded in Bridge Log Book, Noon Reports, Arrival and Departure report and Passage Plan in GMT or local time. The reports are transmitted to the company's head office through an electronic communication, as soon as practicable.

Responsible person	On board	Ashore	Ref. Of Procedure	Version of existing Prcedure	IT System Used
	Master	Superintendent Engineer, Operations Dept, DPA	N/A	N/A	Microsoft Excel

7.7 Processes that will be used to report the data to the Administration

Description

The responsible person on-board submits reports to the company, at least once a month, indicating the fuel consumption, distance travelled and hours underway. The responsible person ashore, receives the reports and completes the SEEMP Part II excel form. Greenwich Mean Time is adopted in SEEMP Part II excel form.

Within three months after the end of each calendar year, the company reports to DromonClass, the aggregated value for each datum, as outlined in the appendix 1 along with copies of documents containing information on the amount of fuel oil consumption, distance travelled and hours underway for the ship's voyages during the reporting period (e.g. ship's official logbook, oil record book, BDNs, arrival/departure reports, etc.) via electronic communication.

Responsible person	On board	Ashore	Ref. Of Procedure	Version of existing Procedure	IT System Used
	Master	DPA	N/A	N/A	Microsoft Excel

7.8 Data quality

Description

The completeness, consistency and correctness of fuel consumption, hours underway and distance travelled are verified through BDNs, AIS, Arrival & Departure Reports and Noon Reports by the responsible person ashore.

Methods to treat data gaps and validate the data:

Fuel oil consumption: When the related data is missing, the responsible person onboard requests information regarding the fuel consumption from similar voyages. If similar voyages do not exist, the responsible person onboard requests to perform as soon as possible tank sounding in order to close the gap. In case where the missing data is not immediately identified then the responsible person ashore shall close the gap manually by using the average fuel consumption of the previous and the next day.

Distance travelled: If a data gap related to distance travelled is observed, distance of historical voyages can be used (same port of departure/arrival). Responsible persons on-board and ashore can refer to Bridge Log Book to find historical voyages. If historical voyages are not available, distance travelled is estimated through the updated maps on board the ship.

Hours underway: If data gap related to hours underway is observed, hours underway of historical voyages can be used (same port of departure/arrival). If historical voyages are not available, GPS and AIS can be used by the responsible persons on-board and ashore to estimate the hours underway.

Responsible person	On board	Ashore	Ref. Of Procedure	Version of existing Procedure	IT System Used
	Master & Chief Engineer	DPA	N/A	N/A	Microsoft Excel

7.9 Further information

The following table sets out how the ship will implement the summation of daily fuel oil consumption data and conduct tank readings.

Procedures	Responsible person(s)	Equipment

8 Processes that will be used to report the data

Regulation 22A.3 of MARPOL Annex VI states that the data specified in Appendix IX of the Annex are to be communicated electronically using a standardized form developed by the IMO.

The collected data shall be reported to the Administration or any organization duly authorized by it in the standardized format shown in Appendix B.

The Administration should indicate what additional documentation the ship should submit along with the annual data report shown in Appendix B.

Additional documentation required is as follows:

- 1) A copy of the ship's data collection plan.
- 2) Summaries of BDNs, in sufficient detail to show that all fuel oil consumed by the ship is accounted for (see sample form of BDN summary set out in Appendix C).
- 3) Summaries of disaggregated data of fuel oil consumption, distance travelled and hours underway, in a format specified by the Administration (see sample form of data summary set out in Appendix C).
- 4) Information to demonstrate that the ship followed the data collection plan set out in its SEEMP Part II, including information on data gaps and how they were filled, as well as how the event that caused each data gap was resolved.
- 5) Copies of documents containing information on the amount of fuel oil consumption, distance travelled and hours underway for the ship's voyages

during the reporting period (e.g. the ship's official logbook, oil record book, BDNs, and arrival/noon/departure reports).

9 Appendices

9.1 Appendix I – Types of fuel

Type of fuel	Reference	Lower calorific value (kJ/kg)	Carbon content	CF (t-CO ₂ /t-Fuel)
1 Diesel/Gas Oil	ISO 8217 Grades DMX through DMB	42,700	0.8744	3.206
2 Light Fuel Oil (LFO)	ISO 8217 Grades RMA through RMD	41,200	0.8594	3.151
3 Heavy Fuel Oil (HFO)	ISO 8217 Grades RME through RMK	40,200	0.8493	3.114
4 Liquefied Petroleum Gas (LPG)	Propane	46,300	0.8182	3.000
	Butane	45,700	0.8264	3.030
5 Liquefied Natural Gas (LNG)		48,000	0.7500	2.750
6 Methanol		19,900	0.3750	1.375
7 Ethanol		26,800	0.5217	1.913

9.2 Appendix II – Standardised data reporting format for the data collection system

Name of the ship	AKSON MEISA	IMO number	9446192			
Company	akson denizcilike tic .ltd.sti	Year of delivery	2010			
Flag	PANAMA	Ship type	Bulk arrier			
Gross Tonnage	32983	DWT	56956			
Applicable CII	<input checked="" type="checkbox"/> AER <input type="checkbox"/> cgDIST					
Operational carbon intensity rating	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C	<input type="checkbox"/> D	<input type="checkbox"/> E	
CII for trial purpose (none, one or more on voluntary basis)	EEPI <input type="checkbox"/>	cbDIST <input type="checkbox"/>	cIDIST <input type="checkbox"/>	EEOI <input type="checkbox"/>		
Attained annual operational CII before any correction factors (AER in g CO ₂ /dwt. nm or cgDIST in g CO ₂ /gt.nm)						
Attained annual operational CII (AER in g CO ₂ /dwt. nm or cgDIST in g CO ₂ /gt.nm)						
End date for annual CII (dd/mm/yy) *						
Start date for annual CII (dd/mm/yy) *						
Attained EEDI (if applicable)			N/A			
EEPI (gCO ₂ /dwt.nm)			N/A			
cbDIST (gCO ₂ /berth.nm)			N/A			
cbDIST (gCO ₂ /m.nm)			N/A			
EEOI (gCO ₂ /t.nm or others)			N/A			

Method used to measure fuel oil consumption		BDN+ ROB by Tank Measurements
Fuel oil consumption (t) **	(C _F ;..)	
	Other (.....)	
	Ethanol (C _F : 1.913)	
	Methanol (C _F : 1.375)	
	LNG (C _F : 2.750)	
	LPG (Butane) (C _F : 3.030)	
	LPG (Propane) (C _F : 3.000)	
	HFO (C _F : 3.114)	
	LFO (C _F : 3.151)	
	Diesel/Gas Oil (C _F : 3.206)	
Hours underway (h)		
Distance Travelled (nm)		
Power output (rated power) (kW)	Main Propulsion Power	MCR= 9480 kW
	Auxiliary Engine(s)	MCR= 660
Ice class (if applicable)		N/A
DWT (MT)		56956
NT		19191
Gross Tonnage		32983
Ship type		Bulk Carrier
IMO number		9446192
End date for DCS (dd/mm/yy)		
Start date for DCS (dd/mm/yy)		

9.3 Appendix III – Sample of the BDN summaries and sample of the collected data summaries

Date of Operations (dd/mm/yyyy)	Fuel Oil Type/Mass(MT)									Descriptions
	DO/GO	LFO	HFO	LPG (P)	LPG (B)	LNG	Methanol	Ethano l	Others (CF)	
① BDN										
09/01/2023										
02/05/2023			150							
08/07/2023										
09/10/2023										
10/12/2023			300							
①Annual Supply Amount	0	0	450	0	0	0	0	0	0	
② Correction for the tank oil remainings										
01/01/2023			400							
31/12/2023			200							

②Correction for the tank oil remaining	0	0	200	0	0	0	0	0	0	The difference in the amount of the remaining tank oil at the beginning/end of the data collection period.
③ Other corrections										
30/03/2023										
15/09/2023										
31/12/2023										
③Annual other corrections	0	0	0	0	0	0	0	0	0	
Annual Fuel Consumption										
Annual Fuel Consumption (①+②+③)	0	0	650	0	0	0	0	0	0	
<p align="center">Explanatory remarks;</p> <p>If bunker supply/correction data have been recorded in a Company's electronic reporting system, the data is acceptable to be submitted in the existing format instead of submitting the data by this format.</p>										