

MPA  
Technical Notice

No. **9/2025**

DATED: 29/7/2025

Subject:

**New IMO requirements for  
SEEMP Part II and Part III**

## 1. General

The IMO recently adopted **additional reporting requirements for IMO DCS and the CII reduction factors for 2027-2030.**

**Amendments to MARPOL Annex VI Appendix IX** enter into force on 1 August 2025 that require ships to collect and report additional fuel oil consumption data in a calendar year.

This additional data includes:

- Fuel oil consumption per consumer type and fuel type (including main engines, auxiliary engines etc)
- Fuel oil consumption while not underway per consumer type and fuel type
- Onshore power supplied to the ship
- Laden distance travelled
- Installation of innovative technologies
- Total transport work

## 2. Updates to and Review of the SEEMP Part II

In accordance with MARPOL Annex VI Regulation 5, the ship's Ship Energy Efficiency Management Plan (SEEMP) Part II will require amendment and review by the flag Administration or Recognised Organisation before the subject ship collects the associated data:

- For **existing** ships: **reviewed before 1 January 2026**
- For **new ships** delivered on or **after 1 August 2025**: reviewed before the ship enters service

Section 7 of [MEPC.395\(82\)](#) sets out the recommended methods to collect this "new", more granular data related to fuel oil consumption per consumer type. This includes the following primary methods:

- Using flow meters
- Bunker fuel oil tank monitoring

In most instances the use of flow meters will be needed to improve the accuracy of data collection.

Section 7 of [MEPC.395\(82\)](#) further sets out the following methods which may be used if the primary methods above cannot be applied:

- Using subtraction
- Using estimation

In the case of using one of these secondary methods, it should be demonstrated why one of the two primary methods cannot be used. Where the Estimation method is adopted, prior approval of the procedure followed to estimate the fuel consumption for the consumer type is required from the Administration.

#### **Collection of data for EXISTING SHIPS after 1 August 2025**

Ships that hold a verified **SEEMP Part II** and are collecting the data within the current MARPOL Annex VI Appendix IX before 1 August 2025, are **expected to continue collecting this data after 1 August 2025 until 31 December 2025**. This is to ensure that the data collected and reported is consistent throughout the calendar year. In any case, these ships will be required to collect the **additional data in the Annex to MEPC.385(81) from 1 January 2026**.

#### **Collection of data for NEW SHIPS after 1 August 2025**

For ships that enter service and start collecting data on or after 1 August 2025, it is expected that such ships will collect the data (including the additional data) in the Annex to MEPC.385(81) as they had not collected any data before the amendments entered force.

### **3. New IMO CII Guidelines require SEEMP Part III revisions**

Ships which currently have an approved **SEEMP Part III** will need to have this **revised to include an implementation plan demonstrating how the required CII will be met for the three year- period 2026- 2028**, as per the Guidelines for the verification and Company audits by the Administration of Part III of the Ship Energy Efficiency Management Plan (SEEMP) (MEPC.347(78)).

The **revised SEEMP Part III**, which must include the **implementation plan for the 2026-2028** period and the **required annual operation CII**, needs to be amended and **approved by 31 December 2025**.

**New ships** which are now entering into service, and **existing ships** for which a new SEEMP Part III is being developed resulting from **change in Management Company or Flag**, or both, can include the implementation plan extended to 2028 to avoid reapproval again before 31 December 2025.