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Circular Letter 010/2025

Date: 19.11.2025
Attn.: Authorized Surveyors, Ship Owners, Operators, Managers
Subject: 2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP) AND SUBSEQUENT AMENDMENTS

In accordance with IMO Resolution MEPC.395(82) the “2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)”, which entered in force from the 1 August 2025, the subsequent amendments developed by IMO Resolution MEPC.401(83) should be implemented accordingly.

Kindly find attached:

RESOLUTION MEPC.395(82) - 2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP)

RESOLUTION MEPC.401(83) - AMENDMENTS TO THE 2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP) (RESOLUTION MEPC.395(82))

Kindly be guided accordingly.
Yours faithfully.
Kristina Melikyan
Chief Executive Officer
Veritas Register of Shipping Ltd.

VERITAS REGISTER OF SHIPPING LTD * HEAD OFFICE *

ANNEX 7

RESOLUTION MEPC.395(82)
(adopted on 4 October 2024)

2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP)

THE MARINE ENVIRONMENT PROTECTION COMMITTEE,

RECALLING Article 38(a) of the Convention on the International Maritime Organization concerning the functions of the Marine Environment Protection Committee conferred upon it by international conventions for the prevention and control of marine pollution from ships,

NOTING that regulation 26 of MARPOL Annex VI requires each ship to keep on board a Ship Energy Efficiency Management Plan (SEEMP), to be developed and reviewed, taking into account the guidelines adopted by the Organization,

RECALLING that, at its seventy-eighth session, it adopted, by resolution MEPC.346(78), the *2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*,

RECALLING ALSO that, at its eighty-first session, it adopted, by resolution MEPC.388(81), amendments to the *2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*,

HAVING CONSIDERED, at its eighty-second session, draft amendments to the *2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*, as amended,

1 ADOPTS the *2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*, as set out in the annex to the present resolution;

2 REQUESTS the Parties to MARPOL Annex VI and other Member Governments to bring the annexed Guidelines to the attention of masters, seafarers, shipowners, ship operators and any other interested parties;

3 REVOKES the *2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)* adopted by resolution MEPC.346(78).

ANNEX

2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP)

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1 INTRODUCTION

1.1 The *Guidelines for the development of a Ship Energy Efficiency Management Plan* have been developed to assist with the preparation of the Ship Energy Efficiency Management Plan (SEEMP) required by regulation 26 of MARPOL Annex VI.

1.2 Taken together, the aims of the SEEMP should assist the international shipping sector to achieve the goal of chapter 4 of MARPOL Annex VI set out in regulation 20, which is reducing the carbon intensity of international shipping. The aims of the SEEMP are threefold:

.1 To encourage companies to incorporate actions to improve the energy efficiency and carbon intensity of their ships and ship management practices.

.2 To specify the methodology the ship should use to collect the data required by regulation 27.1 of MARPOL Annex VI and the processes that should be used to report the data to the ship's Administration or any organization duly authorized by it.

.3 To specify the methodology the ship should use to calculate the attained annual operational carbon intensity indicator (CII) as required by regulation 28.1 of MARPOL Annex VI and the processes that should be used to report the data to the ship's Administration or any organization duly authorized by it.

1.3 There are three parts to a SEEMP:

.1 Guidance for Part I of the SEEMP required by regulation 26.1 of MARPOL Annex VI, is addressed in sections 3, 4 and 5 of these Guidelines. The purpose of this part is to provide an approach to monitor ship and fleet efficiency performance over time and describe ways to improve the ship's energy efficiency performance and carbon intensity. Part I of the SEEMP applies to any ship of 400 GT and above.

.2 Guidance for part II of the SEEMP required by regulation 26.2 of MARPOL Annex VI, is addressed in sections 6, 7 and 8 of these Guidelines. The purpose of this part is to provide a description of the methodologies that should be used to collect the data required pursuant to regulation 27 of MARPOL Annex VI and the processes that the ship should use to report the data to the ship's Administration or any organization duly authorized by it. Part II of the SEEMP applies to any ship of 5,000 GT and above.

.3 Guidance for part III of the SEEMP required by regulations 26.3 and 28.8 of MARPOL Annex VI is addressed in sections 9, 10, 11, 12, 13, 14 and 15 of these Guidelines. The purpose of this part is to provide:

.1 a description of the methodology that should be used to calculate the ship's attained annual operational CII required by regulation 28 of MARPOL Annex VI;

.2 the processes that should be used to report this value to the ship's Administration or any organization duly authorized by it;

.3 the required annual operational CII for the next three years;

.4 an implementation plan documenting how the required annual operational CII should be achieved during the next three years;

.5 a procedure for self-evaluation and improvement; and

.6 for ships rated as D for three consecutive years or rated as E, a plan of corrective actions to achieve the required annual operational CII.

1.4 Part III of the SEEMP applies to any ship of 5,000 GT and above which falls into one or more of the categories in regulations 2.2.5, 2.2.7, 2.2.9, 2.2.11, 2.2.14 to 2.2.16, 2.2.22, and 2.2.26 to 2.2.29 of MARPOL Annex VI.

1.5 Sample forms of the various sections of the SEEMP are presented in appendices 1, 2 and 3 for illustrative purposes. A standardized data-reporting format for the data-collection system and operational carbon intensity is presented in appendix 4. A standardized data-reporting format for the trial carbon intensity indicators on voluntary basis is presented in appendix 5.

2 DEFINITIONS

2.1 For the purpose of these Guidelines, the definitions in MARPOL Annex VI apply.

2.2 "Ship fuel oil consumption data" means the data required to be collected on an annual basis and reported as specified in appendix IX to MARPOL Annex VI.

2.3 "Safety management system" means a structured and documented system enabling company personnel to implement effectively the company safety and environmental protection policy, as defined in paragraph 1.1 of the International Safety Management Code.

2.4 "Carbon Intensity Indicator" means a performance indicator by which it is possible to measure the carbon intensity of the ship, as defined in the guidelines developed by the Organization,[1] taking into account data listed for reporting in appendix IX to MARPOL Annex VI.

2.5 "Consumer type" means a type of engine or set of engines, boiler, fuel cell or others used for the same purpose.

PART I - SHIP MANAGEMENT PLAN TO IMPROVE ENERGY EFFICIENCY

3 GENERAL

3.1 Regulation 26.1 of MARPOL Annex VI requires each ship of 400 gross tonnage and above subject to chapter 4 to keep on board a ship-specific SEEMP.

3.2 The purpose of part I of the SEEMP is to establish a mechanism for a company and/or a ship to improve the energy efficiency and reduce the carbon intensity of a ship's operation. Preferably, this aspect of the ship-specific SEEMP is linked to a broader corporate energy management policy for the company that owns, operates or controls the ship, recognizing that no two shipping companies are the same, and that ships operate under a wide range of different conditions.

[1] Refer to the *2021 Guidelines on operational carbon intensity indicators and the calculation methods (CII guidelines, G1)* (resolution MEPC.336(76)) and the *2022 Guidelines on correction factors and voyage adjustments for CII calculations (G5)* (resolution MEPC.355(78)).

3.3 Many companies will already have an environmental management system in place under ISO 14001, which contains procedures for selecting the best measures for particular ships and then setting objectives for the measurement of relevant parameters, along with relevant control and feedback features. Monitoring of operational environmental efficiency should therefore be treated as an integral element of broader company management systems.

3.4 In addition, many companies already develop, implement and maintain a safety management system. In such case, part I of the SEEMP may form part of the ship's safety management system.

3.5 This section provides guidance for the development of part I of the SEEMP, which should be adjusted to the characteristics and needs of individual companies and ships. Part I of the SEEMP is intended to be a management tool to assist a company in managing the ongoing environmental performance of its ships and, as such, it is recommended that a company develop procedures for implementing the plan in a manner which limits any onboard administrative burden to the minimum necessary.

3.6 Part I of the SEEMP should be developed as a ship-specific plan by the company and should reflect efforts to improve the energy efficiency and reduce the carbon intensity of a ship through four steps: planning, implementation, monitoring, and self-evaluation and improvement. These components play a critical role in the continuous cycle to improve ship energy efficiency management and reduce its carbon intensity. With each iteration of the cycle, some elements of part I will necessarily change while others may remain as before.

3.7 At all times safety considerations should be paramount. The trade a ship is engaged in may determine the feasibility of the energy efficiency and carbon intensity reduction measures under consideration. For example, ships that perform services at sea (pipe laying, seismic survey, OSVs, dredgers, etc.) may choose different methods of improving energy efficiency when compared to conventional cargo carriers. The nature of operations and influence of prevailing weather conditions, tides and currents combined with the necessity of maintaining safe operations may require adjustment of general procedures to maintain the efficiency of the operation, for example ships which are dynamically positioned. The length of a voyage and the need to avoid high risk areas may also be important parameters as well as trade specific safety considerations.

4 FRAMEWORK AND STRUCTURE OF PART I OF THE SEEMP

4.1 Planning

4.1.1 Planning is the most crucial stage of part I of the SEEMP, in that it primarily determines both the current status of ship energy usage and carbon intensity and the expected improvement of ship energy efficiency and reduction of carbon intensity. Therefore, it is encouraged to devote sufficient time to planning so that the most appropriate, effective and implementable plan can be developed.

Ship-specific measures

4.1.2 Recognizing that there are a variety of options to improve energy efficiency and reduce carbon intensity (e.g. speed optimization, confirming berth availability and arrival time with port of destination, weather routeing, hull maintenance, retrofitting of energy efficiency devices, and use of alternative fuels), the best package of measures for a ship to improve energy efficiency and reduce carbon intensity depends to a great extent upon ship type, cargoes, routes and other factors, which should be identified in the first place. These measures should be listed as a package of measures to be implemented, thus providing the overview of the actions to be taken for that ship.

4.1.3 During the planning process, therefore, it is important to determine and understand the ship's current status of energy usage. Part I of the SEEMP should identify energy-saving and carbon intensity reducing measures that already have been undertaken and should determine how effective these measures are in terms of improving energy efficiency and reducing carbon intensity. Part I also should identify what measures can be adopted to further improve the energy efficiency and reduce the carbon intensity of the ship. It should be noted, however, that not all measures can be applied to all ships, or even to the same ship under different operating conditions and that some of them are mutually exclusive. Ideally, initial measures could yield energy (and cost) saving results that then can be reinvested in more difficult or expensive efficiency upgrades identified by part I.

4.1.4 Guidance on best practices for fuel-efficient operation of ships, set out in chapter 5, can be used to facilitate this part of the planning phase. Also, in the planning process, particular consideration should be given to minimize any onboard administrative burden.

Company-specific measures

4.1.5 The improvement of the energy efficiency and the reduction of the carbon intensity of ship operation does not necessarily depend on single ship management only. Rather, it may depend on many stakeholders including ship repair yards, shipowners, operators, charterers, cargo owners, fuel suppliers, ports and traffic management services. For example, "just in time" – as explained in paragraph 5.2.4 – requires good early communication among operators, ports and traffic management services. The better the coordination among such stakeholders, the more improvement can be expected. In most cases, such coordination or total management is better made by a company rather than by a ship. In this sense, it is recommended that a company also establish an energy efficiency and carbon intensity management plan to improve the performance of its fleet (should it not have one in place already) and effect the necessary coordination among stakeholders.

Human resource development

4.1.6 For effective and steady implementation of the adopted measures, raising awareness of and providing necessary training for personnel both on shore and on board are an important element. Such human resource development is encouraged and should be considered as an important component of planning as well as a critical element of implementation.

Goal setting

4.1.7 The last part of planning is goal setting.

.1 For ships also subject to regulation 28 of MARPOL Annex VI, the goal setting should be consistent with the continuous CII improvements set out by that regulation, and should include the relevant information (see paragraph 9.7). These ships are also encouraged to consider setting ship-specific goals in addition to the applicable CII requirements that strive for additional energy efficiency improvements and carbon intensity reductions.

.2 For ships or companies not subject to regulation 28, there are no requirements to define a goal and to communicate it to the public, or to be subject to external inspection, surveys, or audits with respect to the SEEMP. Nevertheless, a meaningful goal should be defined to serve as a signal of a company's commitment to improve the energy efficiency and carbon intensity of the ship. The goal can be set using different indicators, including the annual fuel consumption, Annual Efficiency Ratio (AER), cgDIST, Energy

Efficiency Operational Indicator (EEOI) or other carbon intensity indicators (CIIs).[2] In all cases, the goal should be measurable and easy to understand.

4.2 Implementation

Establishment of implementation system

4.2.1 After a ship and a company identify the energy efficiency and carbon intensity measures to be implemented, it is essential to establish a system for their implementation. This is done by developing the procedures for energy management, defining tasks associated with those procedures, and assigning those tasks to responsible personnel. The implementation system should include procedures to ensure execution of measures and specify defined levels of authority and lines of communication. Also, it should include procedures for internal audits and management review, where relevant. In sum, part I of the SEEMP should describe how each measure should be implemented and who the responsible person or persons are. The implementation period (start and end dates) of each selected measure should be indicated. The development of such an implementation system can be considered as a part of planning, and therefore may be completed at the planning stage.

Implementation and record-keeping

4.2.2 The planned measures should be carried out in accordance with the predetermined implementation system. Record-keeping for the implementation of each measure is beneficial for self-evaluation at a later stage and should be encouraged. If any identified measure cannot be implemented for any reason, the reason or reasons should be recorded for internal use. It is recommended that events and operational conditions outside the control of the ship's crew (for example, waiting for berths, extended port dwell times, operation in severe adverse weather) which may affect the ships rating be documented.

4.3 Monitoring

Monitoring tools

4.3.1 The energy efficiency of a ship should be monitored quantitatively. This should be done by an established method, preferably by an international standard. In many cases, the monitoring tool should target the goal indicator set out in paragraph 4.1.7 (e.g. AER, cgDIST, EEOI, or other CIIs as agreed by the Organization). If a quantitative goal is not defined for a ship, a quantitative performance indicator developed by the Organization (e.g. AER, EEOI, CII) or another internationally established tool should be selected. A ship subject to regulation 28 is likely to use the CII as its monitoring tool.

4.3.2 If used, these CIIs should be calculated in accordance with the guidelines developed by the Organization,[3] adjusted, as necessary, to a specific ship and trade.

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[2] Refer to the *2022 Guidelines on operational carbon intensity indicators and the calculation methods (CII guidelines, G1)* (resolution MEPC.352(78)) and the *2022 Interim guidelines on correction factors and voyage adjustments for CII calculations (G5)* (resolution MEPC.355(78)).

[3] Refer to the *Guidelines for voluntary use of the ship energy efficiency operational indicator (EEOI)* (MEPC.1/Circ.684) and the *2022 Guidelines on operational carbon intensity indicators and the calculation methods (CII guidelines, G1)* (resolution MEPC.352(78)) and the *2022 Interim guidelines on correction factors and voyage adjustments for CII calculations (G5)* (resolution MEPC.355(78)).

4.3.3 Ships subject to regulation 28 may use other measurement tools in addition to the CII, if convenient and/or beneficial for a ship or a company. In the case where other monitoring tools are used, the reason for the use of the tool and the method of monitoring should be clarified at the planning stage.

4.3.4 It is highly advised to conduct monitoring at regular intervals for checking consistency of data and verification assistance. The ship's fuel oil consumption should be monitored using daily reporting, such as noon reports, or higher frequency data.

Establishment of monitoring system

4.3.5 It should be noted that whatever measurement tools are used, continuous and consistent and reliable data collection is the foundation of monitoring. To allow for meaningful and consistent monitoring, a monitoring system, including the procedures for collecting data and the assignment of responsible personnel, should be developed. The development of such a system can be considered as a part of planning, and therefore should be completed at the planning stage.

4.3.6 It should be noted that, in order to avoid unnecessary administrative burdens on ships' staff, monitoring should be carried out as much as possible by shore staff when the data can be automatically transferred, utilizing data obtained from existing required records such as the official and engineering logbooks and oil record books. Additional data could be obtained as appropriate.

Search and rescue

4.3.7 When a ship diverts from its scheduled passage to engage in search and rescue operations, and for which emissions are excluded pursuant to regulation 3, it is recommended that data obtained during such operations not be used in ship energy efficiency monitoring, and that such data be recorded separately.

4.4 Self-evaluation and improvement

4.4.1 Self-evaluation and improvement is the final phase of the management cycle. This phase should produce meaningful feedback for the coming first stage, i.e. planning stage of the next improvement cycle.

4.4.2 The purpose of self-evaluation is to:

.1 evaluate the effectiveness of the planned measures and their implementation;

.2 deepen the understanding of the overall characteristics of the ship's operation such as what types of measures can or cannot function effectively, and how and/or why;

.3 comprehend the trend of the efficiency improvement of that ship; and

.4 develop the improved management plan for the next cycle through identification of further opportunities for improving energy efficiency and reducing carbon intensity.

4.4.3 For this process, procedures for self-evaluation of the ship energy efficiency management plan should be developed. Furthermore, self-evaluation should be implemented periodically by using data collected through monitoring. In addition, it is recommended that time be invested in identifying the cause and effect of the performance during the evaluated period so lessons learned can be taken into account when revising and improving the next stage of the ship's energy efficiency management plan.

5 GUIDANCE ON BEST PRACTICES FOR FUEL-EFFICIENT OPERATION OF SHIPS

5.1 The search for energy efficiency and carbon intensity improvement across the entire transport chain takes responsibility beyond what can be delivered by the company alone. A list of all the possible stakeholders in the efficiency of a single voyage is long: obvious parties are designers, shipyards and engine manufacturers for the characteristics of the ship; and charterers, fuel suppliers, ports and vessel traffic management services, etc. for the specific voyage. All parties involved should consider the inclusion of efficiency measures in their operations both individually and collectively.

5.2 Fuel-efficient operations

Improved voyage planning

5.2.1 The optimum route and improved efficiency can be achieved through the careful planning and execution of voyages. Thorough voyage planning needs time, but a number of software tools are available to assist in voyage planning.

5.2.2 The *Guidelines for voyage planning*, adopted by resolution A.893(21), provide essential guidance for the ship's crew and voyage planners.

Weather routeing

5.2.3 Weather routeing has a high potential for efficiency savings on specific routes. It is commercially available for all types of ship and for many trade areas.

Just in time

5.2.4 Good early communication with the next port should be an aim in order to give maximum notice of berth availability and facilitate the use of optimum speed where port operational procedures support this approach.

5.2.5 Optimized port operation could involve a change in procedures involving different ship handling arrangements in ports. Port authorities should be encouraged to maximize efficiency and minimize delay.

Speed optimization

5.2.6 Speed optimization can produce significant savings. However, optimum speed means the speed at which the fuel used per tonne mile is at a minimum level for that voyage. It does not mean minimum speed; in fact, sailing at less than optimum speed will consume more fuel rather than less. Reference should be made to the engine manufacturer's power/consumption curve and the ship's propeller curve. Possible adverse consequences of slow speed operation may include increased vibration and problems with soot deposits in combustion chambers and exhaust systems. These possible consequences should be taken into account. For LNG carriers speed optimization means, quite often, a higher speed at the start of laden passages to control tanks pressure and at the end of ballast passages to use the operational LNG quantity needed for cargo tank cooling in propulsion instead of wasting in GCU or condenser steam dump. Charterers are generally aware of the improved efficiency of this speed pattern.

5.2.7 As part of the speed optimization process, due account may need to be taken of the need to coordinate arrival times with the availability of loading/discharge berths, etc. The number of ships engaged in a particular trade route may need to be taken into account when considering speed optimization.

5.2.8 A gradual increase in speed when leaving a port or estuary whilst keeping the engine load within certain limits may help to reduce fuel consumption.

5.2.9 It is recognized that under many charter parties the speed of the ships is determined by the charterer and not the operator. Efforts should be made when agreeing charter party terms to encourage the ship to operate at optimum speed in order to maximize energy efficiency.

Optimized shaft power

5.2.10 Operation at constant shaft RPM can be more efficient than continuously adjusting speed through engine power. The use of automated engine management systems to control speed rather than relying on human intervention may be beneficial.

5.2.11 When optimizing shaft power, due attention should be given to overall power system efficiency. For example, in some cases reducing load or shaft speed below the minimum necessary to operate energy recovery systems and shaft generators may increase overall emissions.

5.3 Optimized ship handling

Optimum trim

5.3.1 Most ships are designed to carry a designated amount of cargo at a certain speed for a certain fuel consumption. This implies the specification of set trim conditions. Loaded or unloaded, trim has a significant influence on the resistance of the ship through the water and optimizing trim can deliver significant fuel savings. For any given draft there is a trim condition that gives minimum resistance. In some ships, it is possible to assess optimum trim conditions for fuel efficiency continuously throughout the voyage. Design or safety factors may preclude full use of trim optimization.

Optimum ballast

5.3.2 Ballast should be adjusted taking into consideration the requirements to meet optimum trim and steering conditions and optimum ballast conditions achieved through good cargo planning.

5.3.3 When determining the optimum ballast conditions, the limits, conditions and ballast management arrangements set out in the ship's Ballast Water Management Plan are to be observed for that ship.

5.3.4 Ballast conditions have a significant impact on steering conditions and autopilot settings, and it needs to be noted that less ballast water does not necessarily mean improved energy efficiency.

Optimum propeller and propeller inflow considerations

5.3.5 Selection of the propeller is normally determined at the design and construction stage of a ship's life but new developments in propeller design have made it possible for retrofitting of later designs to deliver greater fuel economy. Whilst it is certainly for consideration, the propeller is but one part of the propulsion train and a change of propeller in isolation may have no effect on efficiency and may even increase fuel consumption.

5.3.6 Improvements to the water inflow to the propeller using arrangements such as fins and/or nozzles could increase propulsive efficiency power and hence reduce fuel consumption.

Optimum use of rudder and heading control systems (autopilots)

5.3.7 There have been large improvements in automated heading and steering control systems technology. Whilst originally developed to make the bridge team more effective, modern autopilots can achieve much more. An integrated Navigation and Command System can achieve significant fuel savings by simply reducing the distance sailed "off track". The principle is simple: better course control through less frequent and smaller corrections will minimize losses due to rudder resistance. Retrofitting of a more efficient autopilot to existing ships could be considered.

5.3.8 During approaches to ports and pilot stations the autopilot cannot always be used efficiently as the rudder has to respond quickly to given commands. Furthermore, at certain stages of the voyage it may have to be deactivated or very carefully adjusted, i.e. during heavy weather and approaches to ports.

5.3.9 Consideration may be given to the retrofitting of improved rudder blade design (e.g. "twist-flow" rudder).

Hull maintenance

5.3.10 Docking intervals should be integrated with the company's ongoing assessment of ship performance. Hull resistance can be optimized by new technology-coating systems, possibly in combination with cleaning intervals. Regular in-water inspection of the condition of the hull is recommended.

5.3.11 Propeller cleaning and polishing or even appropriate coating may significantly increase fuel efficiency. The need for ships to maintain efficiency through in-water hull cleaning should be recognized and facilitated by port States.

5.3.12 Consideration may be given to the possibility of timely full removal and replacement of underwater paint systems to avoid the increased hull roughness caused by repeated spot blasting and repairs over multiple dockings.

5.3.13 Generally, the smoother the hull, the better the fuel efficiency.

Propulsion system

5.3.14 Marine diesel engines have a very high thermal efficiency (~50%). This excellent performance is only exceeded by fuel cell technology with an average thermal efficiency of 60%. This is due to the systematic minimization of heat and mechanical loss. In particular, the new breed of electronic controlled engines can provide efficiency gains. However, specific training for relevant staff may need to be considered to maximize the benefits.

Propulsion system maintenance

5.3.15 Maintenance in accordance with manufacturers' instructions in the company's planned maintenance schedule will also maintain efficiency. The use of engine condition monitoring can be a useful tool to maintain high efficiency.

5.3.16 Additional means to improve engine efficiency might include use of fuel additives, adjustment of cylinder lubrication oil consumption, valve improvements, torque analysis, and automated engine monitoring systems.

5.4 Waste heat recovery

5.4.1 Waste heat recovery systems use thermal heat losses from the exhaust gas for either electricity generation, heating or additional propulsion with a shaft power take in.

5.4.2 It may not be possible to retrofit such systems into existing ships. However, they may be a beneficial option for new ships. Shipbuilders should be encouraged to incorporate new technology into their designs.

5.5 Improved fleet management

5.5.1 Better utilization of fleet capacity can often be achieved by improvements in fleet planning. For example, it may be possible to avoid or reduce long ballast voyages through improved fleet planning. There is opportunity here for charterers to promote efficiency. This can be closely related to the concept of "just in time" arrivals.

5.5.2 Efficiency, reliability and maintenance-oriented data sharing within a company can be used to promote best practice among ships within a company and should be actively encouraged.

5.6 Improved cargo handling

Cargo handling is in most cases under the control of the port or terminal operators and optimum solutions matched to ship and port or terminal requirements should be explored. However, in cases where ships use their own cargo handling equipment (e.g. cargo cranes, self-unloading booms, cargo pumps (tankers)), procedures should be in place to efficiently utilize the energy produced from any additional generators required to operate the equipment.

5.7 Energy management

5.7.1 A review of electrical services on board can reveal the potential for unexpected efficiency gains. However, care should be taken to avoid the creation of new safety hazards when turning off electrical services (e.g. lighting). Thermal insulation is an obvious means of saving energy. Also see comment below on shore power.

5.7.2 Optimization of reefer container stowage locations may be beneficial in reducing the effect of heat transfer from compressor units. This might be combined as appropriate with cargo tank heating, ventilation, etc. The use of water-cooled reefer plant with lower energy consumption might also be considered.

5.8 Fuel type

The use of emerging alternative fuels may be considered as a CO_2 reduction method, but availability will often determine the applicability.

5.9 Other measures

5.9.1 Development of computer software for the calculation of current fuel consumption, for the establishment of an emissions "footprint", to optimize operations, and the establishment of goals for improvement and tracking of progress may be considered.

5.9.2 Renewable energy sources, such as solar (or photovoltaic) cell technology, have improved enormously in recent years and should be considered for onboard application.

5.9.3 In some ports shore power may be available for some ships but this is generally aimed at improving air quality in the port area. If the shore-based power source is carbon efficient, there may be a net efficiency benefit. Ships may consider using onshore power if available.

5.9.4 Even wind-assisted propulsion may be worthy of consideration. Various systems are available for retrofit, including Flettner rotors, wing sails and aerofoil kites.

5.9.5 Efforts could be made to source fuel of improved quality in order to minimize the amount of fuel required to provide a given power output.

5.10 Compatibility of measures

5.10.1 These Guidelines indicate a wide variety of possibilities for energy efficiency improvements for the existing fleet. While there are many options available, they are not necessarily cumulative, are often area and trade dependent and likely to require the agreement and support of a number of different stakeholders if they are to be utilized most effectively.

Age and operational service life of a ship

5.10.2 All measures identified in this document as applied to part I of the SEEMP are potentially cost-effective in case of high oil prices. The financial feasibility of a specific energy efficiency enhancement can be evaluated by various means. One way would be to estimate the return on investment (ROI) time. However, while measures with lower ROI may have the lowest cost, this does not guarantee the best results in energy efficiency performance improvement. Clearly, this equation is heavily influenced by the remaining service life of a ship and the cost of fuel.

Trade and sailing area

5.10.3 The feasibility of many of the measures described in this guidance will be dependent on the trade and sailing area of the ship. Sometimes ships will change their trade areas as a result of a change in chartering requirements, but this cannot be taken as a general assumption. For example, certain types of wind-enhanced power sources might not be feasible for short sea shipping as these ships generally sail in areas with high traffic densities or in restricted waterways. Air draught limitations may also affect the feasibility of wind assistance technology and certain other emission reduction measures. Another aspect is that the world's oceans and seas each have characteristic conditions and so ships designed for specific routes and trades may not obtain the same energy efficiency benefits by adopting the same measures or combination of measures as other ships that operate in different areas. It is also likely that some measures will have a greater or lesser effect in different sailing areas.

5.10.4 The trade a ship is engaged in may also determine the feasibility of the efficiency measures under consideration. For example, ships that perform services at sea (pipe laying, seismic survey, OSVs, dredgers, etc.) may choose different methods of improving energy efficiency when compared to conventional cargo carriers. The length of voyage may also be an important parameter as may trade specific safety considerations. The pathway to the most efficient combination of measures will be unique to each vessel within each shipping company.

5.10.5 Environmental conditions and the nature of cargo carried also varies between regions. For example, some routes may carry greater volumes of goods requiring careful temperature conditioning, or some transit regions may be subject to frequent severe adverse weather conditions. This may lead to an increase in emissions of ships serving those routes and regions.

PART II - SHIP FUEL OIL CONSUMPTION DATA-COLLECTION PLAN

6 GENERAL

6.1 Regulation 26.2 of MARPOL Annex VI specifies that "in the case of a ship of 5,000 gross tonnage and above, the SEEMP shall include a description of the methodology that will be used to collect the data required by regulation 27.1 of this Annex and the processes that will be used to report the data to the ship's Administration". Part II of the SEEMP, the Ship Fuel Oil Consumption Data-Collection Plan (hereinafter referred to as "Data-Collection Plan") contains such methodology and processes.

6.2 With respect to part II of the SEEMP, these Guidelines provide guidance for developing a ship-specific method to collect, aggregate and report ship data with regard to annual fuel oil consumption, distance travelled, hours under way and other data required by regulation 27 of MARPOL Annex VI to be reported to the Administration.

6.3 Pursuant to regulation 5.4.5 of MARPOL Annex VI, the Administration should ensure that each covered ship's SEEMP complies with regulation 26.2 of MARPOL Annex VI prior to collecting any data.

7 GUIDANCE ON METHODOLOGY FOR COLLECTING DATA ON FUEL OIL CONSUMPTION, DISTANCE TRAVELLED AND HOURS UNDER WAY AND OTHER ITEMS

Total annual fuel oil[4] consumption

7.1 Fuel oil consumption should 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 under way or not. Methods for collecting data on annual fuel oil consumption in metric tonnes include (in no particular order):

.1 method using bunker delivery notes (BDNs):

This method determines the annual total amount of fuel oil used based on BDNs, which are required for fuel oil for combustion purposes delivered to and used on board a ship 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. The Data-Collection Plan should set out how the ship will operationalize the summation of BDN information and conduct tank readings. The main components of this approach are as follows:

.1 annual fuel oil consumption would be the total mass of fuel oil used on board the vessel as reflected in the BDNs. In this method, the BDN fuel oil quantities would be used to determine the annual total mass of fuel oil consumption, plus the amount of fuel oil left over from the last calendar year period and less the amount of fuel oil carried over to the next calendar year period;

[4] Regulation 2.1.14 of MARPOL Annex VI defines "fuel oil" as any fuel delivered to and intended for combustion purposes for propulsion or operation on board a ship, including gas, distillate and residual fuels.

.2 to determine the difference between the amount of remaining tank oil before and after the period, the tank reading should be carried out at the beginning and the end of the period;

.3 in the case of a voyage that extends across the data-reporting period, the tank reading should occur by tank monitoring at the ports of departure and arrival of the voyage and by statistical methods, such as rolling average using voyage days;

.4 fuel oil tank readings should be carried out by appropriate methods such as automated systems, soundings and dip tapes. The method for tank readings should be specified in the Data-Collection Plan;

.5 the amount of any fuel oil offloaded should be subtracted from the fuel oil consumption of that reporting period. This amount should be based on the records of the ship's oil record book; and

.6 any supplemental data used for closing identified difference in bunker quantity should be supported with documentary evidence;

.2 method using flow meters:

This method determines the annual total amount of fuel oil consumption by measuring fuel oil flows on board by using flow meters. In case of the breakdown of flow meters, manual tank readings or other alternative methods will be conducted instead. The Data-Collection Plan should set out information about the ship's flow meters and how the data will be collected and summarized, as well as how necessary tank readings should be conducted, as follows:

.1 annual fuel oil consumption may be the sum of daily fuel oil consumption data of all relevant fuel oil consuming processes on board measured by flow meters;

.2 the flow meters applied to monitoring should be located so as to measure all fuel oil consumption on board. The flow meters and their link to specific fuel oil consumers should be described in the Data-Collection Plan;

.3 note that it should not be necessary to correct this fuel oil measurement method for sludge if the flow meter is installed after the daily tank as sludge will be removed from the fuel oil prior to the daily tank;

.4 the flow meters applied to monitoring fuel oil flow should be identified in the Data-Collection Plan. Any consumer not monitored with a flow meter should be clearly identified, and an alternative fuel oil consumption measurement method should be included; and

.5 calibration of the flow meters should be specified. Calibration and maintenance records should be available on board;

.3 method using bunker fuel oil tank monitoring on board:

.1 to determine the annual fuel oil consumption, the amount of daily fuel oil consumption data measured by tank readings which are carried out by appropriate methods such as automated systems, soundings and dip tapes will be aggregated. The tank readings will normally occur daily when the ship is at sea and each time the ship is bunkering or de-bunkering; and

.2 the summary of monitoring data containing records of measured fuel oil consumption should be available on board;

.4 method using LNG cargo tank monitoring on board:

LNG ships use the Custody Transfer Monitoring System to monitor/record the cargo volumes inside the tanks. When calculating the consumption:

.1 the LNG liquid volume consumed is converted to mass using the methane density of 422 kg/m^3. This is because LNG is transported at methane boiling point, while other heavier hydrocarbons have a higher boiling point and remain at liquid state; and

.2 nitrogen mass content is subtracted for each laden voyage from LNG consumption as it does not contribute to CO_2 emissions;

.5 method using cargo tank monitoring on board for ships using cargo other than LNG as a fuel:

.1 to determine the annual fuel oil consumption, the amount of daily fuel oil consumption data measured by tank readings which are carried out by appropriate methods to the cargo used as a fuel. The method for tank readings should be specified in the SEEMP Data-Collection Plan; and

.2 the tank readings will normally occur daily when the ship is at sea and each time the ship is loading or discharging cargo; and the summary of monitoring data containing records of measured fuel oil consumption should be available on board.

7.2 Any corrections, e.g. density, temperature, nitrogen content for LNG, if applied, should be documented.[5]

Fuel oil consumption per consumer type

7.3 For the collection of fuel oil consumption per consumer type (main engines, auxiliaries, boilers and others), the methods can include:

.1 method using flow meters:

This method determines the annual fuel oil consumption by measuring fuel oil flows on board by using flow meters. In case of the breakdown of flow meters, manual tank readings or other alternative methods will be conducted

[5] For example, ISO 8217 provides a method for liquid fuel.

instead. The Data-Collection Plan should set out information about the ship's flow meters and how the data will be collected and summarized, as well as how necessary tank readings should be conducted, as follows:

.1 annual fuel oil consumption may be the sum of daily fuel oil consumption data of each consumer type on board measured by flow meters;

.2 the flow meters applied to monitoring should be located so as to measure all fuel oil consumption for each consumer type;

.3 note that it should not be necessary to correct this fuel oil measurement method for sludge if the flow meter is installed after the daily tank as sludge will be removed from the fuel oil prior to the daily tank;

.4 the flow meters applied to monitoring fuel oil flow and their link to specific fuel consumer types should be identified in the Data-Collection Plan. Any individual consumer of a consumer type not monitored with a flow meter should be clearly identified, and an alternative fuel oil consumption measurement method should be included; and

.5 calibration of the flow meters should be specified. Calibration and maintenance records should be available on board;

.2 method using bunker fuel oil tank monitoring on board:

.1 to determine the annual fuel oil consumption of each consumer type, the amount of daily fuel oil consumption data measured by tank readings which are carried out by appropriate methods such as automated systems, soundings and dip tapes will be aggregated. The tank readings will normally occur daily when the ship is at sea and each time the ship is bunkering or de-bunkering; and

.2 the summary of monitoring data containing records of measured fuel oil consumption should be available on board;

7.4 If there is a consumer type whose fuel oil consumption cannot be determined directly according to one of the methods indicated in paragraphs 7.3.1 and 7.3.2, the annual fuel oil consumption of that consumer type should be determined according to one of the following methods. The method used to determine the annual fuel oil consumption of each consumer type should be described in detail in the Data-Collection Plan. Note that each consumer type may use a different method to measure fuel oil consumption.

.1 method using subtraction:

If the fuel consumption for only one of the consumer types is not available, the fuel consumption of this consumer type may be derived by subtracting the fuel consumption of the other consumer types from the total annual fuel oil consumption measured in paragraph 7.1; and

.2 method using estimated fuel oil consumption:

In cases where none of the above methods in paragraphs 7.3.1, 7.3.2 and 7.4.1 can be applied, an alternative method that is to the satisfaction of the Administration or any organization recognized by it may be used to estimate the annual fuel oil consumption of the consumer type, based for example on manufacturer data or actual historic fuel consumption for a specified period.

Conversion factor C_F

7.5 If fuel oils are used that do not fall into one of the categories as described in the *2022 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships* (resolution MEPC.364(79)), and have no C_F-factor assigned (e.g. some "hybrid fuel oils"), the fuel oil supplier should provide a C_F-factor for the respective product supported by documentary evidence.

Distance travelled

7.6 Appendix IX of MARPOL Annex VI specifies that distance travelled should be submitted to the Administration and:

.1 distance travelled over ground in nautical miles should be recorded in the logbook in accordance with SOLAS regulation V/28.1;[6]

.2 the distance travelled while the ship is under way under its own propulsion should be included in the aggregated data of distance travelled for the calendar year; and

.3 other methods to measure distance travelled accepted by the Administration may be applied. In any case, the method applied should be described in detail in the Data-Collection Plan.

7.7 Laden distance should be calculated as the distance sailed when the ship is loaded.

Hours under way

7.8 Appendix IX of MARPOL Annex VI specifies that hours under way should be submitted to the Administration. Hours under way should be an aggregated duration while the ship is under way under its own propulsion.

Data quality

7.9 The Data-Collection Plan should include data quality control measures which should be incorporated into the existing safety management system. Additional measures to be considered could include:

.1 the procedure for identification of data gaps and correction thereof; and

.2 the procedure to address data gaps if monitoring data is missing, for example, flow meter malfunctions.

[6] Distance travelled measured using satellite data is distance travelled over the ground.

Total amount of onshore power supplied

7.10 The total amount of onshore power supplied should be calculated as the sum of the amount of onshore power supplied in kWh. The amount of onshore power supplied should be recorded based on a relevant document from the power supplier. The document should be stored. This information as shown on the bill from the port or electricity provider could be included in the electronic record.

Total transport work

7.11 Total transport work is the annual sum of each voyage's transport work, which is distance sailed multiplied by cargo carried during a voyage. Relevant transport work metrics per ship types are provided in table 1 below.

Table 1: Transport work to be reported per ship type

Ship type	Transport work metric
bulk carriers, tankers, combination carriers, gas carriers, LNG carriers, general cargo ships, ro-ro cargo ships (vehicle carriers), ro-ro cargo ships	$\sum_v (cargo_mass_v \times distance_v)$
containerships	$\sum_v ((cargo_mass_v + container_mass_v) \times distance_v))$ and $\sum_v (No_of_TEU_v \times distance_v)$
cruise passenger ships	$\sum_v (No_of_passengers_v \times distance_v)$
ro-ro passenger ships	$\sum_v (No_of_passengers_v \times distance_v)$ and $\sum_v (cargo_mass_v \times distance_v)$

A standardized data-reporting format

7.12 Regulation 27.3 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 Organization. The collected data should be reported to the Administration in the standardized format shown in appendix 4.

8 DIRECT CO_2 EMISSIONS MEASUREMENT

8.1 Direct CO_2 emission measurement is not required by regulation 27 of MARPOL Annex VI.

8.2 Direct CO_2 emissions measurement, if used, should be carried out as follows:

.1 this method is based on the determination of CO_2 emission flows in exhaust gas stacks by multiplying the CO_2 concentration of the exhaust gas with the exhaust gas flow. In case of the absence or/and breakdown of direct CO_2 emissions measurement equipment, manual tank readings will be conducted instead;

.2 the direct CO_2 emissions measurement equipment applied to monitoring is located so as to measure all CO_2 emissions from the ship. The locations of all equipment applied are described in the monitoring plan; and

.3 calibration of the CO_2 emissions measurement equipment should be specified. Calibration and maintenance records should be available on board.

PART III - SHIP OPERATIONAL CARBON INTENSITY PLAN

9 GENERAL

9.1 Regulation 26.3.1 of MARPOL Annex VI specifies that, for certain categories of ships of 5,000 GT and above, on or before 1 January 2023, the SEEMP shall include:

.1 a description of the methodology that will be used to calculate the ship's attained annual operational CII required by regulation 28 of MARPOL Annex VI and the processes that will be used to report this value to the ship's Administration;

.2 the required annual operational CIIs, as specified in regulation 28 of MARPOL Annex VI, for the next three years;

.3 an implementation plan documenting how the required annual operational CIIs will be achieved during the next three years; and

.4 a procedure for self-evaluation and improvement.

9.2 Sections 9 to 15 of these Guidelines provide guidance for ships to which regulation 26.3 of MARPOL Annex VI applies for the following purposes:

.1 to assist them in developing part III of the ship's SEEMP, including guidance on developing a ship-specific method to collect necessary data;

.2 to describe the methodology that will be used to calculate the ship's attained annual operational CII value and report this to the ship's Administration;

.3 to determine the ship's required annual operational CII for the next three years;

.4 to develop and apply an implementation plan documenting how the required annual operational CIIs will be achieved during the next three years;

.5 to define a procedure for self-evaluation and improvement; and

.6 to develop corrective actions, as applicable.

9.3 The required annual operational CII is to be calculated in accordance with regulation 28 and taking into account the guidelines developed by the Organization.[7]

[7] Refer to the *2022 Guidelines on the reference lines for use with operational carbon intensity indicators (CII reference lines guidelines, G2)* (resolution MEPC.353(78)) and the *2021 Guidelines on the operational carbon intensity reduction factors relative to reference lines (CII reduction factors guidelines, G3)* (resolution MEPC.338(76)).

9.4 In addition, pursuant to regulation 28 of MARPOL Annex VI, part III of the SEEMP is further to include calculation methodologies and a plan of corrective actions for ships that are rated D for three consecutive years or rated as E.

9.5 The ship's attained annual operational carbon intensity is to be calculated taking into account the guidelines developed by the Organization.[8]

9.6 Ships of 5,000 GT and above that are subject to regulations 26.3 and 28 of MARPOL Annex VI are strongly encouraged to review part I of their SEEMP to revise it as needed to reflect the actions taken to achieve the ship's CII requirements.

9.7 The goal setting, as referred to in paragraph 4.1.7 in part I, should be consistent with the requirements of regulation 28 of MARPOL Annex VI and should include the ship's required annual operational CII for the next three years following the updating of the SEEMP.

9.8 In addition, while ships subject to regulation 28 of MARPOL Annex VI may rel~~a~~y on the CII requirements when defining goals under part I of the SEEMP, they are encouraged to consider setting additional ship-specific goals that go beyond the applicable CII requirements and strive for energy efficiency improvements and carbon intensity reductions beyond such requirements.

9.9 Ships subject to regulation 28 of MARPOL Annex VI may consider voluntarily using one or more of the trial CIIs (EEPI, cbDIST, clDIST or EEOI), where applicable, for the purpose of providing supporting data for decision-making to support the review clause set out in regulation 28.11 of MARPOL Annex VI. A standardized data-reporting format for the parameters to calculate the trial carbon intensity indicators on a voluntary basis is presented in appendix 5. A description of the methodology that should be used to calculate the trial CII should be included in the SEEMP.

9.10 Part III of the ship's SEEMP should be updated in case of voluntary modifications or necessary corrective actions are involved (every three years).

10 ATTAINED ANNUAL OPERATIONAL CII CALCULATION METHODOLOGY, DATA-COLLECTION PLAN AND DATA QUALITY

10.1 Taking into account the guidelines developed by the Organization,[9] part III of the SEEMP provides detailed information on how the ship's attained annual operational CII should be calculated. Regulation 28 of MARPOL Annex VI states that the attained annual operational CII shall be calculated, using the data collected in accordance with regulation 27 (Fuel Oil Data-Collection System).

10.2 In describing the calculation methodology, part III of the SEEMP should include a detailed description of the data required for the calculation of the attained annual operational CII. The data collection should follow the relevant methodology and requirements on the Fuel Oil Data-Collection System pursuant to regulation 27 of MARPOL Annex VI (see part II of these Guidelines).

[8] Refer to the *2022 Guidelines on operational carbon intensity indicators and calculation methods (CII Guidelines, G1)* (resolution MEPC.352(78)) and the *2022 Interim guidelines on correction factors and voyage adjustments for CII calculations (G5)* (resolution MEPC.355(78)).

[9] Refer to the *2022 Guidelines on operational carbon intensity indicators and calculation methods (CII Guidelines, G1)* (resolution MEPC.352(78)) and the *2022 Interim guidelines on correction factors and voyage adjustments for CII calculations (G5)* (resolution MEPC.355(78)).

10.3 In case of transfer of the ship from one company to another according to regulation 27.5 or 27.6 of MARPOL Annex VI, all relevant data necessary for the calculation of the attained annual operational CII should be submitted by the former company to the receiving company within one month after the date of transfer. The data should have been verified by the Administration or any organization duly authorized by it according to regulation 6.7 of MARPOL Annex VI before they are transferred to the receiving company. The format of the transfer should be consistent with appendix 4 and such that the receiving company can use it in the calculations of the attained annual operational CII for the whole year in which the transfer takes place.

10.4 In case the former company does not transfer the required data, the Administration may make relevant data submitted to the IMO Fuel Oil Consumption Database available to the receiving company. In case of a transfer of both company and Administration concurrently, the incoming Administration may make a request to the Organization for access to the data according to regulation 27.11. If no such data is available, the attained annual operational CII can be calculated and verified using the available data covering a period of the preceding calendar year as long as practically possible.

10.5 In case of transfer of a ship from one Administration to another according to regulation 27.4 of MARPOL Annex VI the data needed for calculating the annual attained CII is already in the possession of the relevant company and no further exchange of data is needed.

11 REQUIRED ANNUAL OPERATIONAL CII FOR NEXT THREE YEARS

11.1 Part III of the SEEMP describes the required annual operational CII values for the ship for each of the next three years, calculated in accordance with regulation 28 of MARPOL Annex VI and taking into account the guidelines developed by the Organization,[10] as the basis for those calculations.

12 THREE-YEAR IMPLEMENTATION PLAN

12.1 The three-year implementation plan describes the measures the ship plans to take to continue to achieve the required annual operational CII over the next three-year period. These may include, but are not limited to, measures as outlined in section 5 of these Guidelines.

12.2 The three-year implementation plan is ship-specific.

12.3 The three-year implementation plan should be SMART (Specific, Measurable, Achievable, Realistic and Time-bound) to the extent envisaged and feasible. It should include:

.1 a list of measures that improve the energy efficiency and reduce the carbon intensity of the ship, with time and method of implementation necessary for achieving the required operational CII;

.2 a description of how, when the listed measures are implemented, the required operational CII will be achieved, taking into consideration the combined effect of the measures on operational carbon intensity;

[10] Refer to the *2022 Guidelines on the reference lines for use with operational carbon intensity indicators (CII reference lines guidelines, G2)* (resolution MEPC.353(78)) and the *2021 Guidelines on the operational carbon intensity reduction factors relative to reference lines (CII reduction factors guidelines, G3)* (resolution MEPC.338(76)).

.3 the company personnel responsible for the three-year implementation plan, and for monitoring and recording performance throughout the year for the reviewing of the effectiveness of the three-year implementation plan; and

.4 identification of possible impediments to the effectiveness of the measures for improving the energy efficiency and reducing the carbon intensity of the ship, including possible contingency measures put in place to overcome these impediments.

12.4 The three-year implementation plan should be monitored and adjusted when necessary, and the data to be monitored, identified.

13 PROCESS FOR SELF-EVALUATION AND IMPROVEMENT (IN ADDITION TO SECTION 4.4. OF THESE GUIDELINES)

13.1 The purpose of self-evaluation is to evaluate the effectiveness of the planned measures and their implementation, to deepen the understanding of the overall characteristics of the ship's operation, such as what types of measures can function effectively, and how or why, to comprehend the trend of the efficiency improvement of that ship, to understand trends in the ship's utilization in terms of cargo carried and areas of operation, and to develop an improved action plan for the next cycle. This evaluation should produce meaningful feedback based on experience in the previous period, to enhance performance in the next period.

13.2 Procedures for self-evaluation of the ship's energy usage and carbon intensity should be developed and included in this section of the SEEMP. Self-evaluation should be carried out periodically based on data collected through monitoring. It is recommended that the cause and effect of the ship's performance in the evaluated period be identified in order to identify measures for improving performance during the next period.

13.3 The process of self-evaluation and improvement could consist of the following elements:

.1 regular internal shipboard and company audits to verify implementation and the effectiveness of the system;

.2 improvement, i.e. implementing preventive or modifying measures (responsible personnel within the company should evaluate such audit reports and implement corrective actions including preventive or modifying measures); and

.3 periodical review of the SEEMP and associated documents, to update the SEEMP in a manner which minimizes any administrative and unnecessary burdens on company personnel and ship staff.

13.4 The content of the self-evaluation and improvement could include the following elements:

.1 criteria for evaluation, including elements to evaluate, such as quality of monitoring, record-keeping, effectiveness of implemented measures (including cause and effect) and achievement of the goal;

.2 the evaluation of the effectiveness of the different measures taken, in terms of energy efficiency and carbon intensity;

.3 which measures contribute the most and how much, which measures do not contribute and are therefore not efficient, which ship and/or company-specific elements adversely affect the CII and how these could be improved;

.4 timeline for starting the review process ahead of the end of the compliance period and for implementation of new measures in the subsequent year;

.5 measures identified to address deficiencies and discrepancies including correction of data gaps and system weaknesses, new measures to improve implementation (e.g. training) as well as new carbon intensity improvement measures as needed;

.6 where relevant, actions that will be taken to bring the ship into better CII ratings including estimated quantification of the additional expected reduction in carbon intensity;

.7 where applicable, if a plan of corrective actions is required, the plan should include items listed under 15.4.5 to bring the ship out of inferior performance; and

.8 where relevant, identification of critical factors that contributed to missing the CII target.

14 REVIEW AND UPDATE OF PART III OF THE SEEMP

14.1 Regulation 26.1 of MARPOL Annex VI provides that "Each ship shall keep on board a ship-specific Ship Energy Efficiency Management Plan (SEEMP). This may form part of the ship's safety management system. The SEEMP shall be developed and reviewed, taking into account guidelines adopted by the Organization". Regulation 26.3.2 of MARPOL Annex VI provides that "For ships rated as D for three consecutive years or rated as E, in accordance with regulation 28 of this Annex, the SEEMP shall be reviewed in accordance with regulation 28.8 of this Annex to include a plan of corrective actions to achieve the required annual operational CII".

14.2 The company should ensure that the SEEMP is reviewed and updated when necessary, as per paragraph 9.10.

14.3 The SEEMP should include a log for when it has been reviewed and updated and identify which parts have been changed.

15 PLAN OF CORRECTIVE ACTIONS

15.1 A plan of corrective actions is not required to be included in the SEEMP unless a ship has been rated D for three consecutive years or E for one year.

15.2 For a ship that is required to develop a plan of corrective actions in accordance with regulation 28.7 of MARPOL Annex VI, a revised SEEMP including the corrective actions for CII reduction shall be submitted to the Administration or any organization duly authorized by it for verification in accordance regulation 28.8 of MARPOL Annex VI. The revised SEEMP should be submitted together with the plan of corrective actions, but in no case later than one month after reporting the attained annual operational CII in accordance with regulation 28.2.

15.3 Regulation 28.9 of MARPOL Annex VI further provides that "A ship rated as D for three consecutive years or rated as E shall duly undertake the planned corrective actions in accordance with the revised SEEMP."

15.4 **Developing the plan of corrective actions**

15.4.1 The purpose of the plan of corrective actions is to set out what actions a ship that was rated D for three consecutive years or E for one year should take to achieve at least a C rating for the calendar year following the adoption of the plan of corrective actions and ultimately the required annual operational CII.

15.4.2 The plan of corrective actions is ship-specific.

15.4.3 Many of the approaches described in section 5 of these guidelines or any other suitable measure may be applied to a ship to improve its fuel efficiency and thus its CII rating.

15.4.4 The plan for corrective action should describe the actions that the ship plans to take, the timeline in which those actions will be applied, and the expected impact their application will have on the ship's CII rating. It should be demonstrated how the corrective actions will contribute to achieving the required annual operational CII, so as to ascertain the effectiveness of the corrective actions. Experience gained from previously taken corrective actions and their degree of effectiveness should be taken into account when selecting the proper corrective actions.

15.4.5 The plan of corrective actions should be SMART (Specific, Measurable, Achievable, Realistic and Time-bound). It should include:

.1 an analysis of the cause of the inferior CII rating;

.2 an analysis of the performance of implemented measures;

.3 a list of additional measures and revised measures to be added to the implementation plan with time and method of implementation necessary for achieving the required operational CII;

.4 designation of a company person to be responsible for the added and revised measures in the implementation plan, monitoring and recording performance throughout and reviewing of the effectiveness of the corrective actions; and

.5 identification of possible impediments to the effectiveness of the measures for improving the energy efficiency and reducing the carbon intensity of the ship, including possible additional contingency measures put in place to overcome and how these impediments will be overcome.

15.4.6 The implementation of the plan of corrective actions should be monitored and adjusted when necessary. Additional measures should be taken to strengthen corrective actions in case of insufficient intermediate results.

15.4.7 The company should ensure that it is in a position to perform the actions set out in the plan of corrective actions and confirm that it is able to do so when submitting its updated SEEMP.

APPENDIX 1

SAMPLE FORM OF SHIP MANAGEMENT PLAN TO IMPROVE ENERGY EFFICIENCY (PART I OF THE SEEMP)

Name of ship:		Gross tonnage:	
Ship type:		Capacity:	
IMO number:			

Date of development:		Developed by:	
Implementation period:	From: Until:	Implemented by:	
Planned date of next evaluation:			

Review and update log

Date/timeline	Updated parts	Developed by	Implemented by

1 MEASURES

Energy efficiency measures	**Implementation** (including the starting date)	**Responsible personnel**

2 MONITORING

Description of monitoring tools

3 GOAL

Measurable goals

4 EVALUATION

Procedures of evaluation

APPENDIX 2

SAMPLE FORM OF SHIP FUEL OIL CONSUMPTION DATA-COLLECTION PLAN (PART II OF THE SEEMP)

1 Review and update log

Date/timeline	Updated parts	Developed by	Implemented by

2 Ship particulars

Name of ship	
IMO number	
Company	
Flag	
Year of delivery	
Ship type	
Gross tonnage	
NT	
DWT	
Attained EEDI (if applicable)	
Attained EEXI (if applicable)	
Ice class	

3 Record of revision of Fuel Oil Consumption Data-Collection Plan

Date of revision	Revised provision

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

	Engines or other fuel oil consumer type	Power	Fuel oil types
1	Type/model of main engine	(kW)	
2	Type/model of auxiliary engine	(kW)	
3	Boiler	(…)	
4	Inert gas generator	(…)	
5	Others (Specify)	(…)	

5 Emission factor

C_F is a non-dimensional conversion factor between fuel oil consumption and CO_2 emission in the *2018 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships* (resolution MEPC.308(73)), as amended. The annual total amount of CO_2 is calculated by multiplying annual fuel oil consumption and C_F for the type of fuel.

Fuel oil type	C_F (t-CO_2 / t-Fuel)
Diesel/Gas oil (e.g. ISO 8217 grades DMX through DMB)	3.206
Light fuel oil (LFO) (e.g. ISO 8217 grades RMA through RMD)	3.151
Heavy fuel oil (HFO) (e.g. ISO 8217 grades RME through RMK)	3.114
Liquefied petroleum gas (LPG) (Propane)	3.000
Liquefied petroleum gas (LPG) (Butane)	3.030
Liquefied natural gas (LNG)	2.750
Methanol	1.375
Ethanol	1.913
Other (……)	

6 Method to measure fuel oil consumption

The applied methods for measurement for each consumer type of this ship are given below. The description explains the procedure for measuring data and calculating annual values, measurement equipment involved, etc.

Engines or other fuel oil consumer type	**Method**	**Description**
Type/model of main engine		
Type/model of auxiliary engine		
Boiler		
Others (Specify)		

7 Method to measure distance travelled including laden distance

Description

8 Method to measure hours under way

Description

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

Description

10 Data quality

Description

APPENDIX 3

SAMPLE FORM OF SHIP OPERATIONAL CARBON INTENSITY PLAN (PART III OF THE SEEMP)

1 Review and update log

Date/timeline	Updated parts	Developed by	Implemented by
<1st time>			
<2nd time>			
Etc.			

2 Required CII over the next three years, attained CII and rating over three consecutive years

Name of the ship		IMO number	
Company		Year of delivery	
Flag		Ship type	
Gross tonnage		DWT	
Applicable CII		☐AER ; ☐cgDIST	

Year	Required annual operational CII	Attained annual operational CII (before any correction)	Attained annual operational CII	Operational carbon intensity rating (A, B, C, D or E):
<year -1>				
<year -2>				
<year -3>				

	Required annual operational CII
<year>:	
<year + 1>	
<year + 2>	

3 Calculation methodology of the ship's attained annual CII, including required data and how to obtain these data as far as not addressed in part II

Description

4 Three-year implementation plan

Description

Company personnel to be responsible for the three-year implementation plan, monitoring and recording performance

List of measures to be considered and implemented

Measure	Impact on CII	Time and method of implementation and responsible personnel			Impediments and contingency measures	
		Milestone	**Due**	**Responsible**	**Impediment**	**Contingencies**
		Milestone	**Due**	**Responsible**	**Impediment**	**Contingencies**
		Milestone	**Due**	**Responsible**	**Impediment**	**Contingencies**
		Milestone	**Due**	**Responsible**	**Impediments**	**Contingencies**

Calculation showing the combined effect of the measures and that the required operational CII will be achieved

Year	Required annual operational CII	Targeted operational annual CII	Targeted rating
<year>:			
<year + 1>			
<year + 2>			

5 Self-evaluation and improvement

Description

6 Plan of corrective actions (if applicable)

Analysis of causes for inferior CII rating

Cause	Analysis of effect	Actions

Analysis of measures in the implementation plan

Measure	Analysis of effect	Actions

List of additional measures and revised measures to be added to the implementation plan

Measure	Impact on CII	Time and method of implementation and responsible personnel			Impediments and contingency measures	
		Milestone	Due	Responsible	Impediments	Contingencies

APPENDIX 4

STANDARDIZED DATA-REPORTING FORMAT FOR THE DATA-COLLECTION SYSTEM AND OPERATIONAL CARBON INTENSITY TO THE ADMINISTRATION

Identity of the ship

Name of the ship	
Company	
Flag	
IMO number	
Period of the calendar year for which the data is submitted	
Start date for DCS (dd/mm/yy)	
End date for DCS (dd/mm/yy)	

Technical characteristics of the ship

Year of delivery		
Ship type, as defined in regulation 2.2 of MARPOL Annex VI or other (to be stated)		
Gross tonnage (GT)		
Net tonnage (NT)		
Deadweight tonnage (DWT)		
Power output (rated power) over 130 (kW)	Main Engine(s)	
	Auxiliary Engine(s)	
Attained EEDI (if applicable)		
Attained EEXI (if applicable)		
Ice class (if applicable)		

Fuel oil[1] consumption data

Total fuel oil consumption data		
Fuel oil type	Quantity in metric tonnes (t)	Method(s) used for collecting fuel oil consumption data (BDN / Flow meters / bunker FO tank monitoring / LNG cargo tank monitoring / Cargo tank monitoring other than LNG)
Diesel/Gas Oil (CF: 3.206)		
LFO (CF: 3.151)		
HFO (CF: 3.114)		
LPG (Propane) (CF: 3.000)		
LPG (Butane) (CF: 3.030)		
Ethane (CF: 2.927)		
LNG (CF: 2.750)		

[1] Regulation 2.1.14 of MARPOL Annex VI defines "fuel oil" as any fuel delivered to and intended for combustion purposes for propulsion or operation on board a ship, including gas, distillate and residual fuels.

Total fuel oil consumption data		
Methanol (CF: 1.375)		
Ethanol (CF: 1.913)		
Other (…….) (Cf: ……..)		

Total fuel oil consumption data per consumer type			
Fuel oil type	Consumer type	Quantity in metric tonnes (t)	Method used for collecting fuel oil consumption data (Flow meters / bunker FO tank monitoring / subtraction / estimated)
Diesel/Gas Oil (CF: 3.206)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
LFO (CF: 3.151)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
HFO (CF: 3.114)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
LPG (Propane) (CF: 3.000)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
LPG (Butane) (CF: 3.030)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler (s)		
	Others (specify)		
Ethane (CF: 2.927)	Main engines (s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler (s)		
	Others (specify)		
LNG (CF: 2.750)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
Methanol (CF: 1.375)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
Ethanol (CF: 1.913)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
Other(…….) (Cf: ……..)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler (s)		
	Others (specify)		

Fuel oil consumption data while the ship is not under way, per consumer type			
Fuel oil type	Consumer type	Quantity in metric tonnes (t)	Method used for collecting fuel oil consumption data
Diesel/Gas Oil (CF: 3.206)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
LFO (CF: 3.151)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
HFO (CF: 3.114)	Main engines(s)		
	Auxiliary engines		
	Fired Boiler(s)		
	Others (specify)		
LPG (Propane) (CF: 3.000)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
LPG (Butane) (CF: 3.030)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
Ethane (CF: 2.927)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
LNG (CF: 2.750)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
Methanol (CF: 1.375)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler (s)		
	Others (specify)		
Ethanol (CF: 1.913)	Main engines (s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		
Other (…….) (Cf: ……..)	Main engines(s)		
	Auxiliary engine(s)/Generator(s)		
	Fired Boiler(s)		
	Others (specify)		

Total distance travelled (nm)	
Laden distance travelled (nm) (on a voluntary basis)	
Hours under way (h)	
Total amount of onshore power supplied (kWh)	

For ships to which regulation 28 of MARPOL Annex VI applies:

Total transport work	
Applicable CII	□AER ; □cgDIST
Required annual operational CII	
Start date for annual CII (dd/mm/yy)[2]	
End date for annual CII (dd/mm/yy)[2]	
Attained annual operational CII before any correction (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)	
Installation of innovative technology, if applicable (refer to MEPC.1/Circ.896)	□A ; □B-1 ; □B-2 ; □C-1 ; □C-2
Operational carbon intensity rating	□A ; □B ; □C ; □D ; □E
CII for trial purpose (none, one or more on voluntary basis)	□EEPI ; □cbDIST ; □clDIST ; □EEOI
EEPI (gCO_2/dwt.nm)	
cbDIST (gCO_2/berth.nm)	
clDIST (gCO_2/m.nm)	
EEOI (gCO_2/t.nm or others)	

[2] In the event of any transfer of a ship addressed in regulations 27.4, 27.5 or 27.6, these dates should be completed consistent with regulation 28.3 of MARPOL Annex VI (i.e. full 12-month period from 1 January to 31 December in the calendar year during which the transfer took place).

APPENDIX 5

STANDARDIZED DATA-REPORTING FORMAT FOR THE PARAMETERS TO CALCULATE THE TRIAL CARBON INTENSITY INDICATORS ON VOLUNTARY BASIS*

Attained annual EEOI	
Metric of Cargo Mass Carried or Work Done in EEOI calculation (gCO_2/t.nm or others)*****	
Transport work*****	
Attained annual EEPI (gCO_2/dwt.nm)	
Laden distance travelled (n.m)	
Attained annual clDIST (gCO_2/m.nm) ****	
Length of lanes (metre) ****	
Attained annual cbDIST(gCO_2/berth.nm) ***	
Available lower berths***	
End date for trial CII (dd/mm/yy)**	
Start date for trial CII (dd/mm/yy)**	
IMO number**	
End date for DCS (dd/mm/yy)**	
Start date for DCS (dd/mm/yy)**	

* For reporting a trial CII, the data should be reported as applicable taking into account the information already provided in appendix 4.

** Consistent with appendix 4.

*** Only applicable to cruise passenger ships.

**** Only applicable to ro-ro ships.

***** As defined in section 3 of *Guidelines for voluntary use of the ship energy efficiency operational indicator (EEOI)* circulated by MEPC.1/Circ.684. The distance travelled shall be determined from berth of the port of departure to berth of the port of arrival and shall be expressed in nautical miles.

***

ANNEX 6

RESOLUTION MEPC.401(83)
(adopted on 11 April 2025)

AMENDMENTS TO THE 2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP)
(RESOLUTION MEPC.395(82))

THE MARINE ENVIRONMENT PROTECTION COMMITTEE

RECALLING Article 38(a) of the Convention on the International Maritime Organization concerning the functions of the Marine Environment Protection Committee (the Committee) conferred upon it by international conventions for the prevention and control of marine pollution from ships,

NOTING that regulation 26 of MARPOL Annex VI requires each ship to keep on board a Ship Energy Efficiency Management Plan (SEEMP), to be developed and reviewed, taking into account the guidelines adopted by the Organization,

RECALLING that, at its eighty-second session, it adopted, by resolution MEPC.395(82), the 2024 *Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*,

HAVING CONSIDERED, at its eighty-third session, draft amendments to the *2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*,

1 ADOPTS amendments to the *2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*, the text of which is set out in the annex to the present resolution;

2 INVITES Administrations to take the annexed Guidelines as amended into account when developing SEEMP Part II in accordance with the amendments to appendix IX of MARPOL Annex VI as adopted by resolution MEPC.385(81) on information to be submitted to the IMO Ship Fuel Oil Consumption Database;

3 REQUESTS the Parties to MARPOL Annex VI and other Member Governments to bring the annexed Guidelines to the attention of masters, seafarers, shipowners, ship operators and any other interested parties.

ANNEX

AMENDMENTS TO THE 2024 GUIDELINES FOR THE DEVELOPMENT OF A SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP) (RESOLUTION MEPC.395(82))

7 GUIDANCE ON METHODOLOGY FOR COLLECTING DATA ON FUEL OIL CONSUMPTION, DISTANCE TRAVELLED AND HOURS UNDER WAY AND OTHER ITEMS

1 In paragraph 7.1, the term "boilers" is replaced by "fired boilers".

2 In the chapeau of paragraph 7.3, the term "boilers" is replaced by "fired boilers".

3 A new section "Under way and not under way" is added after the existing section "Conversion factor C_F" and before the section "Distance travelled", as follows:

"**Under way and not under way**

7.6 Under way is defined as the period between full ahead on passage (FAOP) and end of sea passage (EOSP) as per the *Guidelines for setting up a maritime single window* (FAL.5/Circ.42/Rev.3).

Full ahead on passage is more commonly referred to in performance monitoring systems as begin of sea passage, which is also defined in the *IMO Compendium on facilitation and electronic business* (IMO Compendium) under IMO 0597 (Code EV10).

"Not under way" is therefore the period between end of sea passage and full ahead on passage.

Note that canal passage, that is the period between begin canal passage (EV08) and end canal passage (EV09) which are also defined in the IMO Compendium under IMO 0597 should be considered not under way due to frequent manoeuvring, acceleration and deceleration."

Distance travelled

4 Existing paragraphs 7.6 and 7.7 are renumbered as 7.7 and 7.8 respectively, and the renumbered sub-paragraph 7.7.2 is replaced by the following:

".2 the distance travelled while the ship is under way should be included in the aggregated data of distance travelled for the calendar year; and"

Hours under way

5 Existing paragraph 7.8 is renumbered as 7.9 and replaced by the following:

"7.9 Appendix IX of MARPOL Annex VI specifies that hours under way should be submitted to the Administration. Hours under way should be an aggregated duration while the ship is under way."

6 Existing paragraphs 7.9 to 7.12 are renumbered as 7.10 to 7.13 respectively.

APPENDIX 2 SAMPLE FORM OF SHIP FUEL OIL CONSUMPTION DATA-COLLECTION PLAN (PART II OF THE SEEMP)

7 Section 4 is replaced by the following:

"**4 Ship engines and other fuel oil consumers and fuel oil types used**

	Engines or other fuel oil consumer type	Power	Fuel oil types
1	Type/model of main engine	(kW)	
2	Type/model of auxiliary engine	(kW)	
3	Fired boiler	(…)	
4	Inert gas generator	(…)	
5	Others (Specify)	(…)	

"

8 Section 6 is replaced by the following:

"**6 Method to measure fuel oil consumption**

The applied method for measurement of total fuel consumption for this ship is given below. The description explains the procedure for measuring data and calculating annual values, measurement equipment involved, etc.

Method	**Description**

The applied methods for measurement for each consumer type of this ship are given below. The description explains the procedure for measuring data and calculating annual values, measurement equipment involved, etc.

Engines or other fuel oil consumer type	**Method**	**Description**
Type/model of main engine		
Type/model of auxiliary engine		
Fired boiler		
Others (Specify)		

"

***