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# Subject: Guidance on the Amendment to SEEMP Part II and III

#### 1. Overview

In accordance with MARPOL Annex VI, ships of 5,000 gross tonnage and above engaged in international voyages\* are required to have on board a Ship Energy Efficiency Management Plan (SEEMP) Part II (methodology for collecting fuel oil consumption data) and SEEMP Part III (operational carbon intensity management plan). These shall be verified and approved by the Administration or any organization duly authorized by it, and a Confirmation of Compliance (CoC) shall be kept on board together with the approved SEEMP.

\* SEEMP Part III applies only to bulk carriers, combination carriers, containerships, cruise passenger ships, gas carriers, general cargo ships, LNG carriers, refrigerated cargo carriers, ro-ro cargo ships, ro-ro cargo ships (vehicle carriers), ro-ro passenger ships, and tankers.

In this regard, pursuant to the subsequent amendments adopted at MEPC 81 and 82 (Resolutions MEPC.388(81) and MEPC.395(82)), amendments to SEEMP Part II are required in order to incorporate the application of **enhanced granularity** under the IMO Data Collection System (DCS). Furthermore, in accordance with regulation 28 of MARPOL Annex VI, the first three-year implementation plan of SEEMP Part III (2023–2025) will expire, and a **new three-year implementation plan** covering **2026–2028** shall be developed.

## 2. Revision of SEEMP Part II to Reflect Enhanced Granularity under the IMO DCS

### 2.1 Amended Requirements

To enhance the usability of the collected data for the future development of regulations and to provide a reliable basis for such development, the IMO MEPC agreed to introduce **enhanced granularity of data**. Accordingly, **Appendix IX of MARPOL Annex VI** was amended and adopted as **Resolution MEPC.385(81)**.

In addition, to facilitate the effective implementation of these amendments, the Guidelines for the

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Development of SEEMP (Resolution MEPC.395(82)) and the Guidelines for Administration Verification of Ship Fuel Oil Consumption Data and Operational Carbon Intensity (Resolution MEPC.389(81)) were revised, and the Guidance on the Application (MEPC.1/Circ.913) was approved to minimize any uncertainty in implementation.

Furthermore, at MEPC 83, amendments to the SEEMP Guidelines were adopted by Resolution MEPC.401(83) to introduce the **definitions** of "Under way" and "Not under way", in order to support the development of propulsion-based CII indicators by excluding fuel consumption during anchoring, port stay, and mooring.

- "Under way" means the period from Full Ahead on Passage (FAOP) to End of Sea
   Passage (EOSP)
   in line with the definition provided in the Maritime Single Window Guidelines (FAL.5/Circ.42/Rev.3).
- "Not under way" means the period from EOSP to FAOP.

Accordingly, companies are required to clearly distinguish between "Under way" and "Not under way" in their voyage data management, and in particular, fuel oil consumption during "Not under way" shall be separately recorded and reported from 2026 onwards.

Summary of the changes of the data to be collected (Appendix IX)		
Before	After	Reflection in SEEMP Part II & III
Fuel oil consumption, by fuel oil type	(unchanged)	(unchanged)
(added)	Fuel oil consumption by fuel oil type	Method to measure fuel oil
	per consumer type: Main Engine, Aux.	consumption by fuel oil consumer
	Engine, Fired Boiler, Others	type
(added)	Fuel oil consumption while the ship	
	is not under way by fuel oil type per	
	consumer type: Main Engine, Aux.	
	Engine, Fired Boiler, Others	
Distance travelled	(unchanged)	(unchanged)
(added)	Laden distance travelled (voluntary)	Method to measure distance
		travelled including laden distance
Hours under way	(unchanged)	(unchanged)
(added)	Total amount of onshore power	Method to measure total amount of
	supplied	onshore power (if applicable)
For ships to which Reg. 28 of MARPOL Annex VI applies:		
(added)	Total transport work	Method to measure total transport
		work (voluntary)
Applicable CII: AER, cgDIST	(unchanged)	(unchanged)
Required annual operational CII		
Attained annual operational CII		
(before/after any correction)		
(added)	Installation of innovative technology,	N/A
	if applicable:	
	A, B-1, B-2, C-1, C-2 (refer to	
	MEPC.1/Circ.896)	

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Operational carbon intensity rating:	(unchanged)	(unchanged)
A, B, C, D, E		
CII for trial purpose(voluntary):		
EEPI, cbDIST, clDIST, EEOI		

### 2.2 Application and Actions to be Taken

The above amendments to the Convention will enter into force on **1 August 2025**. Accordingly, all applicable ships shall revise their **SEEMP Part II** to incorporate the enhanced granularity requirements and obtain verification and approval by the Administration or a Recognized Organization (RO) no later than **31 December 2025**. The **Confirmation of Compliance (CoC)** issued after approval shall be kept on board together with the verified SEEMP Part II, and from **1 January 2026**, DCS and CII data reported shall be collected and reported in accordance with the revised granularity requirements.

For ships subject to **mandatory early implementation** under flag Administration instructions, as well as ships voluntarily opting for early implementation, the collection and reporting of granular data shall commence on **1 January 2025**. For further details, please refer to the KR technical information "Guidance on the Application on Inclusion of Data on Enhanced Granularity in the IMO Ship Fuel Consumption Database (Rev.1)" issued in **November 2024**.

# 3. Establishment of SEEMP Part III for the Next Three-Year Implementation Plan

### 3.1 Regulatory Requirements

The first three-year implementation plan under **SEEMP Part III** was developed for the period 2023–2025. As this plan will expire on 31 December 2025, companies are required to establish **a new implementation plan** covering the period **2026–2028**.

However, if 2023 was not the first year of the ship's three-year implementation plan, the company shall, by 31 December of the last year of the current plan, establish a new implementation plan so that the year following the last implementation year becomes the first year of the next three-year implementation plan. Specific cases are as follows:

- 1) For ships delivered on or after 1 January 2023, the year of delivery becomes the first year of the three-year implementation plan.
- 2) For ships delivered on or after 1 October 2023, the following year becomes the first year of the three-year implementation plan.
- 3) For ships that have undergone a change of company, flag, or both on or after 1 January 2023, the year in which the change occurred becomes the first year of the three-year implementation plan.

# 3.2 Application and Actions to be Taken

All applicable ships shall establish a **SEEMP Part III** covering the three-year period **2026–2028** and obtain verification and approval by the Administration or a Recognized Organization (RO) no later

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than **31 December 2025**. The **Confirmation of Compliance (CoC)** issued after approval shall be kept on board together with the verified SEEMP Part III.

The next implementation plan shall include the following:

- Required annual operational CII, attained annual operational CII, and CII rating (before/after correction) for the past three years (2023–2025)
- Required annual operational CII for each year
- Targeted annual operational CII and targeted CII rating for each year
- Implementation measures for three years to achieve a C rating or above
- Procedures for self-evaluation and improvement

If the Corrective Action Plan (CAP) included in the previously approved SEEMP Part III remains valid for the past implementation period, the corresponding SEEMP Part III and CoC shall be retained on board together with the newly approved SEEMP Part III and CoC for the next three-year implementation plan, until the CAP period expires.

For further details on the implementation and verification of SEEMP Part III, please refer to the KR technical information *"Procedural Instruction for SEEMP Part III Verification and Company Audit (Rev.1)"* issued in **March 2025**.

## 4. Preparation and Support for Shipowners

Korean Register provides the following recommendations and support to assist shipowners and the shipping industry in complying with the revised requirements.

#### 4.1 Recommendations for Preparation

- **Timely Revision and Submission**: The revision of SEEMP Part II and Part III shall be completed by 31 December 2025. In order to avoid delays due to concentrated submissions at the end of the year, companies are advised to prepare in advance and submit early.
- Review and Update of Internal Procedures: To incorporate the IMO DCS enhanced
  granularity requirements and to establish the next three-year implementation plan,
  companies should review and, where necessary, revise their internal data collection and
  management procedures as well as SEEMP-related manuals.
- Voyage status distinction and Reporting Preparation: Companies should ensure that
  voyage data management distinguishes between "Under way" and "Not under way", and
  in particular, fuel oil consumption during "Not under way" periods shall be prepared for
  separate management and reporting from 2026 onwards.

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4.2 Support

Korean Register provides sample documents and operates the SEEMP development module

within the KR GEARs platform to support the implementation of SEEMP Part II and Part III in line

with the revised requirements. By utilizing these tools, companies can incorporate their internal

procedures and operational characteristics and generate compliant plans automatically for

systematic management.

Part II: The online form has been updated to reflect the latest amendments, including the

enhanced granularity requirements.

Part III: The reduction rates for 2027–2030, as adopted at MEPC 83, have been incorporated,

enabling automatic calculation of each ship's required and attained annual CII values and

the preparation of the next three-year implementation plan.

If you have any questions regarding this Technical Information, please contact as below:

- Convention & Legislation Service Team (convention@krs.co.kr) :

General inquiry regarding the relevant convention

- Green Ship Technology Team (krgst@krs.co.kr):

Inquiry regarding the verification of SEEMP Part II and Part III

- End of Document -

Distributions: KR surveyors, Ship owners, Other relevant parties

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