



TECHNICAL INFORMATION

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Subject : Procedural Instruction for SEEMP Part III Verification and Company Audit

[This technical information supersedes the previous technical information 2023-IMO-09.](#)

1. General

1) Development of a SEEMP Part III

- Ships subject to Reg.26.3 of MARPOL Annex VI should develop a SEEMP Part III, including the following, and retain the SEEMP Part III along with the Confirmation of Compliance (CoC), which is issued after approval by the Administration or any organization duly authorized by it, on board the vessel.
 - A. 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;
 - B. the processes that should be used to report this value to the ship's Administration or any organization duly authorized by it;
 - C. the required annual operational CII for the next three years;
 - D. an implementation plan documenting how the required annual operational CII should be achieved during the next three years;
 - E. a procedure for self-evaluation and improvement; and
 - F. 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.
- Ships delivered on or after 1 January 2023 shall comply with the Reg.26.3.1 of MARPOL Annex VI upon delivery. If delivered on or after 1 January, the following year becomes the first year of the three-year implementation plan, and there is no obligation to develop a corrective action

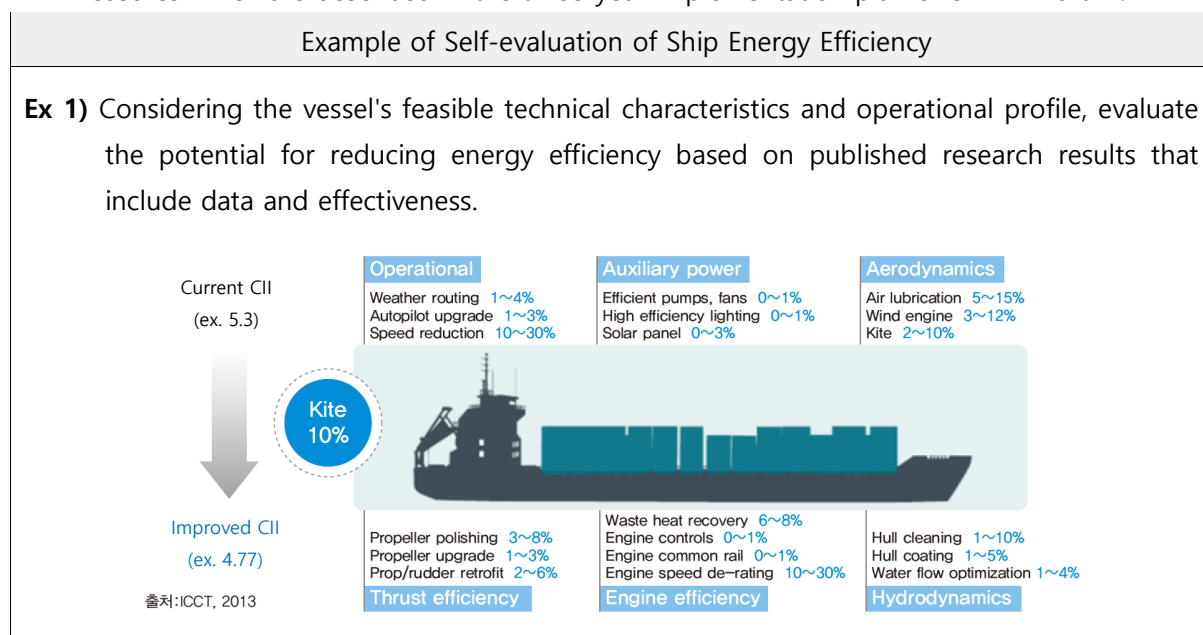
plan, even if a low rating is obtained for the remaining delivery years under Reg.28.6 of MARPOL Annex VI.

- After 1 January 2023, if there is a change in the ship's company, flag, or both, a new SEEMP III should be developed and approved by the Administration or any organization duly authorized by it. The year in which such changes occur becomes the first implementation year for the next three-year implementation plan. In this case, the SEEMP Part III should be prepared for three-year intervals, covering YYYY (the first year of the implementation plan), YYYY+1, and YYYY+2, to include plans for achieving the required CII values for the subsequent three years.
- If there is a change to the SEEMP Part III other than the change in the ship's company, flag Administration, or both, the existing three-year plan will be maintained.

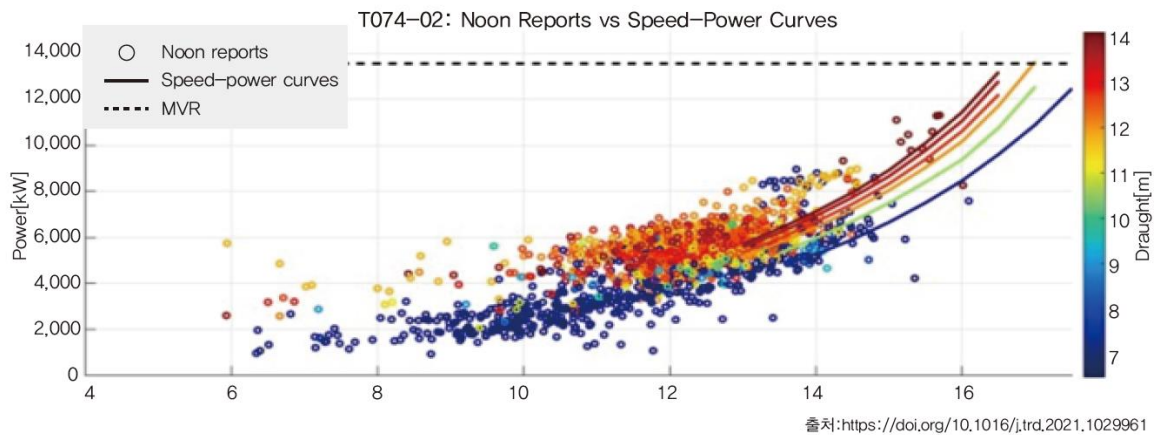
2) Implementation of SEEMP Part III(for ship owners)

(1) Self-evaluation and improvement

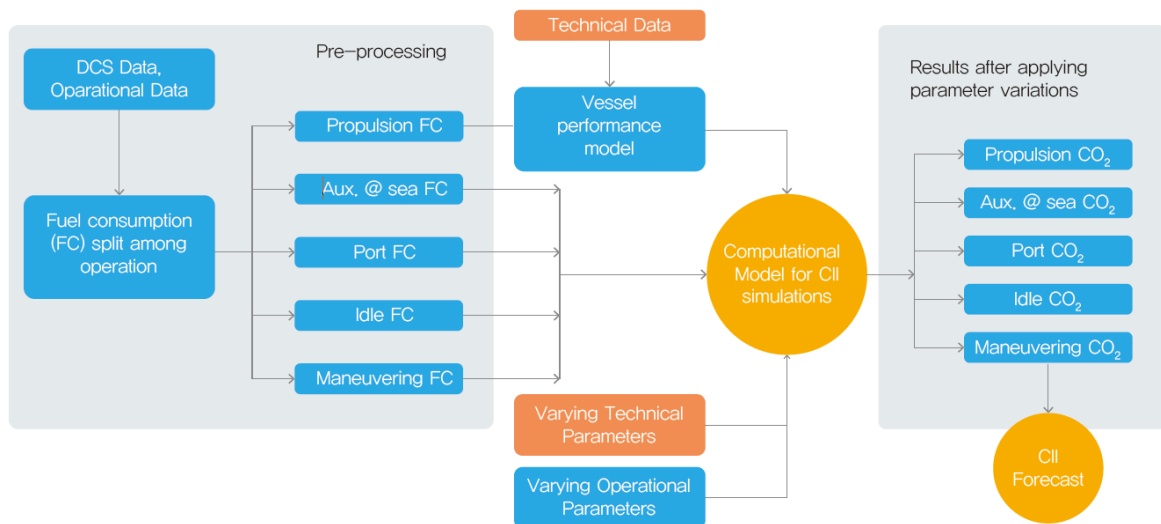
- The CII investigation study when evaluating the performance should include the results of the measures which are described in the three-year implementation plan of SEEMP Part III.



Ex 2) Utilize either simple annual average speed or annual single-speed performance curves.



Ex 3) Evaluate navigation data, draft, speed, and weather (AIS and previous sea data) by combining them with technical factors of the vessel in the ship performance model.



(2) Corrective action plan

- In case an inferior rating 'E' or third time 'D' consecutively is given for data collected in calendar year 'YYYY' (e.g. 2023), the revised SEEMP including the plan of corrective actions should be verified in year 'YYYY+1' (i.e. 2024), and it should be developed to achieve the required annual operational CII for data collected in the calendar year 'YYYY+2' (i.e. 2025).
- In case the corrective action plan is established in the last year in the three-year implementation plan (e.g. 2025), the corrective action plan for the three-year (i.e. 2026-2028) should be included in the SEEMP Part III, additional and revised measures should be added to the three-year implementation plan.

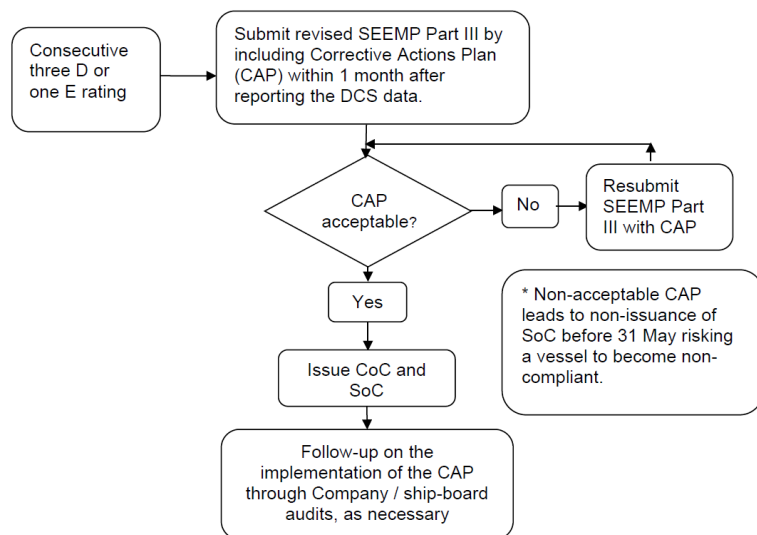


Figure 6.1 Corrective Actions Plan process flow

2. Verification and Company Audit of SEEMP Part III

The verification and company audits required by Reg.26.3.3 of MARPOL Annex VI should be carried out as follows.

(1) Initial verification (MARPOL Annex VI Reg.5.4.6)

- Ships subject to Reg.26.3 of MARPOL Annex VI should develop a SEEMP Part III, including the following, and the Administration duly authorized by it issues the Confirmation of Compliance on the satisfactory assessment of the SEEMP Part III.

Major verification elements	Supporting documentation
<ul style="list-style-type: none">a) verification of the method of calculations of the attained CII complying with guidelines G1 and G5;b) verification of required CII complying with guidelines G2 and G3;c) verification of the description of the method to report ship data to the Administration (excluding the cases where the content is described in SEEMP PART II);d) verify that the implementation plan is prepared in line with the format provided in Appendix 2bis of MEPC.346(78);e) assess the effectiveness (of the combination) of measures, so that when implemented the ship will with reasonable assurance achieve the required annual operational CII, including the goal;f) verify that self-evaluation is planned if necessary, identification of impediments during the course of implementation plan execution and remedial actions;g) robustness of the three-year implementation plan through imparting adequate training to the responsible personnel, implementing data collection-communication-storage system, changes in company's internal documentation, procedures and audit system for shore and on-board operations, etc.;	<ul style="list-style-type: none">- SEEMP Part III and any other supporting documents as requested by verifier- Verified SEEMP Part II

(2) Periodical verification (MARPOL Annex VI Reg.5.4.6)

- In the case where any element of Reg.26.3.1 of MARPOL Annex VI is changed in the previously verified SEEMP Part III, and every three years after the initial verification, the Confirmation of Compliance should be issued by the Administration or any organization authorized by it following the verification.
- If there are no changes to the initially developed SEEMP Part III, for the SEEMP Part III subject to the initial verification by 1 January 2023 (including the 2023-2025 compliance plan), the first periodical verification (including the 2026-2028 implementation plan) should be carried out by 1 January 2026.

Major verification elements	Supporting documentation
Change of Administration	
a) Year of the transfer is the first year of the three-year implementation plan (e.g., year of the transfer: 2024, three-year implementation plan: 2024-2026) b) verification by gaining Administration c) (if applicable) CII values and rating in previous year d) elements a), c) ~ g) of the initial verification	<ul style="list-style-type: none">- Document of Compliance (DOC) issued to the company- Vessel's Safety Management Certificate (SMC) certificate- Vessel's Certificate of Classification- Previously verified SEEMP Part III and CoC- Documentation showing verification of partial data received from former company
Change of Company	
a) Year of the transfer is the first year of the three-year implementation plan (e.g., year of the transfer: 2024, three-year implementation plan: 2024-2026) b) verification of name of gaining company, relevant verified (partial) data (with supporting documents) from the former company c) (if applicable) CII values and rating in previous year d) elements a), c) ~ g) of the initial verification	
Addition and/or deletion of energy efficiency measure(s) impacting CII calculation in implementation plan as a result of the self-evaluation and improvement, change in methodology to calculate CII values	
a) elements a), c) ~ g) of the initial verification	<ul style="list-style-type: none">- Revised SEEMP Part III- Records of self-assessment and decisions made which resulted in modification to the original energy efficiency measures, adoption of additional corrections factors or change in calculation methodology etc.- Verified SEEMP Part II on methodologies on the Fuel Oil Data Collection System pursuant to Reg.27 of MARPOL Annex VI (if necessary)
Major conversion (change in dimensions, carrying capacity or engine power, ship type)	
a) verification of elements of major conversion b) date of major conversion to ensure conversion is done after initial verification c) verification of the method of calculations of the attained CII (before and after conversion) d) elements a), c) ~ g) of the initial verification	<ul style="list-style-type: none">- SEEMP Part III and any other supporting documents as requested by verifier- Verified SEEMP Part II

Every three years after initial verification	
a) elements a), c) ~ g) of the initial verification b) CII values and rating of the previous three years before/after correction of required CII	- Previously verified SEEMP Part III and CoC - SoC for last three years

(3) Additional verification (MARPOL Annex VI Reg.6.8)

- If a ship is rated as D for three consecutive years or E for one year, an additional verification should be performed by the Administration, or any organization duly authorized by it to ensure that a plan of corrective actions has been established in accordance with Reg. 28.7 and 28.8 of MARPOL Annex VI.
- The revised SEEMP Part III should be submitted to the Administration, or any organization duly authorized by it for verification no later than 1 month (i.e. 30 April) after reporting the DCS and attained annual operational CII.

Major verification elements	Supporting documentation
a) verify that the corrective actions plan is necessary for the subject vessel b) verification of corrective actions plan that it has been developed in the format prescribed by Appendix 2bis of the SEEMP Guidelines c) verification of the planned timelines for application of actions described in corrective actions plan d) assess the effectiveness (of the combination) of corrective actions (measures), so that when implemented the ship will with reasonable assurance achieve the required annual operational CII e) verify that company is able to perform the actions set out in the plan of corrective actions	- previously verified SEEMP Part III and CoC - SoC for last three years - documentation in support of analysis of the cause for the inferior CII rating - documentation in support of analysis of the performance of measures in the previous implementation plan - documentation in support of additional and revised measures added to the implementation plan - possible impediments to the effectiveness of the additional measures and relevant contingency measures put in place to overcome these impediments

Table 7.1 Example of additional verification in case of three consecutive D or E rating for ships delivered before 1 January 2023

Verification Year	2023	2024	2025	2026	2027	2028
Data year	-	2023	2024	2025	2026	2027
Case 1 - CII rating	-	E	C(*)	C	B	C
Case 2 - CII rating	-	C	D	E	C(*)	C
Case 3 - CII rating	-	D	D	D	C(*)	C
Remarks	Initial SEEMP without corrective actions plan.	For case 1: SEEMP to be revised by including corrective actions plan to achieve the required annual operational CII for data collected in the calendar year 2025 and to be submitted for verification (additional verification).		For cases 2 and 3: SEEMP to be revised by including corrective actions plan to achieve the required annual operational CII for data collected in the calendar year 2027 and submitted for verification (additional verification).		
	By the end of 2025 updated SEEMP should be prepared and submitted for verification under periodical verification.			By the end of 2028 updated SEEMP should be prepared and submitted for verification under periodical verification.		

3. Details of Company Audits

1) Overview

MARPOL Annex VI Reg.26.3.3 requires that the SEEMP is subject to company audits by the Administration. The purpose of the audit is to:

- A. verify that the SEEMP for which the CoC has previously been issued complies with regulation 26.3.1 and, in the case of non-compliance, require remedial action.
- B. confirm that each sampled ship is being operated in accordance with SEEMP part III, regardless of its rating.
- C. verify the progress made in the (corrective) actions to be taken in the execution of the three-year implementation plan and the plan of corrective actions.
- D. verify self-assessment and improvement of actions taken; and
- E. verify the assignment of responsibilities related to the implementation and monitoring of measures.

Periodical company audits may include annual (additional) company audits as well as shipboard audits. If additional shipboard verifications and company audits, they should take place no later than six months after the issuance of the Statement of Compliance (i.e., by the end of November).

2) Major elements of verification for Company Audits

The purpose of the SEEMP Part III company audit is to verify the efficiency of the system for compliance with the SEEMP Part III by the company and ships. The company audits are mandatory to conduct by the Administration or the RO. Unless otherwise instructed by the Administration, a company audit is performed every three years.

Major elements of verification	Supporting documentation
<p>1. verify that the SEEMP for which the CoC has previously been issued complies with regulation 26.3.1 and, in the case of non-compliance, require remedial action</p> <ul style="list-style-type: none">- Initial establishment date and revision records of SEEMP Part III- Personnel responsible for developing SEEMP PART III and in charge of on-board/on-shore implementation- responsible personnel has received necessary training as appropriate- responsible personnel has received necessary support and resources to fulfill their role- Familiarity with plan and procedures, training level and availability of	<ul style="list-style-type: none">- company's internal procedures- training records- records for support / resources received

resources, through interview	
<p>2. verify the ship particular and CII information</p> <ul style="list-style-type: none"> - verify the ship particular provided in the SEEMP Part II - verify the accuracy of calculated required CII, attained CII, and CII rating. * <ul style="list-style-type: none"> a) verify the method of calculations complying with guidelines G1 and G5 b) verify whether a proper ship capacity was used for calculation of reference line and transport work <p>* in case automatically calculated by KR-GEARs, no further verification is required</p> <ul style="list-style-type: none"> - verify the process for reporting information on the calculation of the attained CII to the ship's Administration <ul style="list-style-type: none"> a) Check whether it is included in SEEMP Part II if not specified in SEEMP Part III 	- verified SEEMP Part II
<p>3. confirm that each sampled ship is being operated in accordance with three-year implementation plan, regardless of its rating</p> <ul style="list-style-type: none"> - whether each measure has been implemented by the due date as per implementation plan <ul style="list-style-type: none"> a) verify that the implementation of the measures are progressing according to plan b) verify that the responsibilities are allocated in relation to the implementation plan and each measure b) verify that the contribution of each measure to CII impact is being evaluated c) verify that the CII is being monitored d) verify other procedures associated with the SEEMP Part III 	<ul style="list-style-type: none"> - monitoring records - evaluation records - company's internal procedures
<p>4. confirm the self-evaluation and improvement of actions taken</p> <ul style="list-style-type: none"> - verify whether procedures for self-evaluation and improvement of the three-year implementation plan have been established - verify whether responsibilities are allocated in relation to the self-assessment and improvement procedures - verify that this is carried out according to the plan 	<ul style="list-style-type: none"> - self-evaluation records - improvement records - company's internal procedures

<ul style="list-style-type: none"> - verify the effectiveness of the process - verify the establishment of company's internal procedures for self-evaluation and improvement 	
<p>5. confirm that ships are being operated in accordance with the corrective action plans</p> <ul style="list-style-type: none"> - for ships rated D for three consecutive years or E for a single year - confirm whether an analysis has been conducted on the reasons for not achieving the targeted CII rating - confirm whether an analysis has been conducted on the reasons why the established implementation plan was not executed successfully - verify the progress according to the established corrective action plan <p>a) progress of each measure according to the corrective action plan</p> <p>b) confirm whether responsibilities are allocated in relation to the monitoring of each measure</p> <p>c) continuous monitoring of CII</p> <p>d) verify whether the evaluations have been conducted regarding the contribution of each measure in the corrective action plan to the CII impact</p> <p>e) confirm the establishment of company's internal procedures for the implementation of corrective action plan</p>	<ul style="list-style-type: none"> - self-evaluation records - improvement records - company's internal procedures

3) Procedure of Company Audits

(1) Application for audits

Application for company audits can be submitted in KR GEARs. For application of both ISM audits and SEEMP audit as combined audit, application for audits can be submitted to the branch office in the jurisdiction or in the KR e-fleet, along with the application for DOC audits and supporting documents. [Applications for shipboard audits can also be submitted in KR-GEARs by selecting the relevant ship information.](#)

(2) Audit plan

Upon the receipt of application, the audit plan will be prepared and provided to the company considering the followings.

- A. Audit details: Date, Place
- B. Audit Personnel: Name and contact information of the assigned auditor

- C. Audit Subject: Name of the flag Administration
- D. Auditee: Responsible dep't and person, and interview schedule
- E. List of documents to be prepared for the audits

(3) Audit progress

Company audits are performed based on the interview with SEEMP responsible person and the document review, including the followings.

- A. Understanding of SEEMP Part III
- B. Adequate support for the implementation of SEEMP Part III
- C. Assurance of responsibility and authority for the 3-year implementation plan within SEEMP Part III
- D. Adequate supervision and support for the 3-year implementation plan within SEEMP Part III
- E. (For additional audits) Support for corrective actions if corrective actions are included in SEEMP Part III
- F. (For additional audits) Assurance of responsibility and authority for corrective actions if corrective actions are included in SEEMP Part III
- G. (For additional audits) Adequate supervision and support for corrective actions if corrective actions are included in SEEMP Part III

(4) Completion of audits

SOF(Statement of Fact) and SEEMP company audit report are issued.

4) Additional requirements of flag Administrations

In principle, company audits are conducted at three-year intervals and should be completed by 31 December 2025. For ships flying the Liberian or Portuguese flags, please refer to the additional requirements outlined below.

(1) Liberia (Marine Advisory: 36/2024)

- Companies with one or more ships that obtained an **E rating** or **two (2) consecutive D ratings** should be **audited** no later than 30 November of the following year
- Companies with ships that obtained ratings other than those mentioned above should be audited at intervals not exceeding three (3) years
- **Shipboard audits** should be conducted for ships that received **two (2) consecutive E ratings**
- The Administration has decided to extend the due date for Company audits to 31 May 2025 (if the original due date falls within this period)

(2) [Portugal \(Flag Instruction No. 02/2025\)](#)

- [A company audit, regardless of the rating received, should be carried out at intervals not exceeding three \(3\) years](#)
- [A company audit should take place during the third year, after **two \(2\) consecutive years**, rated as D, no later than 30 November](#)
- [A company audit, in conjunction with a shipboard audit, should take place during the immediate year after, **being rated as E**, no later than 30 November](#)
- [The Administration has decided to extend the due date for Company audits to 31 December 2025 \(if the original due date falls within this period\)](#)

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** (kgst@krs.co.kr) :

Inquiry regarding the verification of SEEMP Part III

- **Statutory System Certification Team** (conaudit@krs.co.kr) :

General inquiry regarding the audits.

- End of Document -

Distributions : KR surveyors, Ship owners, Other relevant parties

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