

16 September 2025

Marine Advisory: 27/2025  
(Updates Marine Advisory 29/2024)

**SUBJECT: Early Submission of Amended SEEMP Part II and Mandatory Reporting of Revised Ship Fuel Oil Consumption Data**

**Ref:**

- (a) Maritime Regulation 2.35
- (b) Regulations 26, 27 and 28 of 2021 Revised MARPOL Annex VI
- (c) [Marine Notice POL-009](#)
- (d) [MEPC Resolution 385\(81\)](#)
- (e) [MEPC Resolution 388\(81\)](#)
- (f) [MEPC Resolution 395\(82\)](#), as amended by [MEPC Resolution 401\(83\)](#)

**Dear Shipowners/Operators/Masters/Verifiers:**

### **Purpose**

The purpose of this Advisory is to remind all Shipowners, Operators, Masters and Verifiers that the mandatory application of amendments to the Ship Energy Efficiency Management Plan (SEEMP) Part II and reporting of revised fuel oil consumption data commences on 1 January 2026.

### **Background**

[Resolution MEPC 385\(81\)](#) adopted amendments to appendix IX of revised MARPOL Annex VI specified in Attachment 4 of [reference \(c\)](#) providing for collection of fuel oil consumption data with an enhanced level of granularity, which entered into force on 1 August 2025.

[Resolution MEPC 388\(81\)](#) adopted amendments to the 2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP) ([resolution MEPC.346\(78\)](#)) to include a methodology that will be used to collect the data with the enhanced level of granularity. As a consequence, [Resolution MEPC 395\(82\)](#) adopted amendments to appendix 3 “The Standardized Data Reporting Format for the DCS and Operational CI to the Administration” of the 2022 Guidelines adopted as Resolution MEPC.346(78) as amended; hereafter called the 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP). [Resolution MEPC 401\(83\)](#) adopted amendments to the 2024 Guidelines for the development of a SEEMP providing guidance on what is considered ‘under way and not under way’.

## Mandatory Implementation

It should be noted that no later than 1 January 2026, the SEEMP shall be developed taking into account guidelines in MEPC [Resolution 395\(82\)](#), as amended; and each ship shall collect data specified in *Attachment 4* of [reference \(c\)](#) and report fuel oil consumption data using the standardized format specified in revised *Attachment 5* of [reference \(c\)](#), within 3 months after the end of 2026 (i.e. from January to March 2027) for each ship of 5,000 gross tonnage and above engaged in international voyages.

Within 3 months after the end of each calendar year, each ship of 5,000 gross tonnage and above engaged in international voyages, which falls into one or more of the categories on the table below shall continue to report to the Verifier, the attained annual operational CII, via electronic communication and using the standardized format in revised *Attachment 5* of [reference \(c\)](#).

Bulk Carrier (2.2.5)	LNG Carrier (2.2.16)
Combination Carrier (2.2.7)	Refrigerated Cargo Carrier (2.2.22)
Containership (2.2.9)	Ro-Ro Cargo Ship (2.2.26)
Cruise Passenger Ship (2.2.11)	Ro-Ro Cargo Ship (Vehicle Carrier) (2.2.27)
Gas Carrier (2.2.14)	Ro-Ro Passenger (2.2.28)
General Cargo Ship (2.2.15)	Tanker (Oil/Chemical) (2.29)

Shipowners and Operators, of ships with SEEMP Part II already onboard their ships, are encouraged to submit their ships' amended SEEMP Part II by **1 October 2025, or as soon thereafter as possible**, for review and verification to one of the authorized Verifiers listed in [Appendix 1](#),

The Verifier shall verify the SEEMP Part II taking into account the 2024 Guidelines for the development of a SEEMP, as amended, using the web-service/API being developed for this purpose, no later than 1 October 2025.

Verifiers shall verify and submit fuel oil consumption and annual operational carbon intensity (CII) data for calendar year 2026, using the '2025 Fuel Oil Consumption Schema' on the API developed for this purpose. The '2023 Fuel Oil Consumption Schema' will be discontinued on 1 January 2026 for submitting 2026 calendar year data.

For more information, please contact the Regulations and Standards Department at [RegsandStandards@liscr.com](mailto:RegsandStandards@liscr.com) or telephone +1 703 790 3434.

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