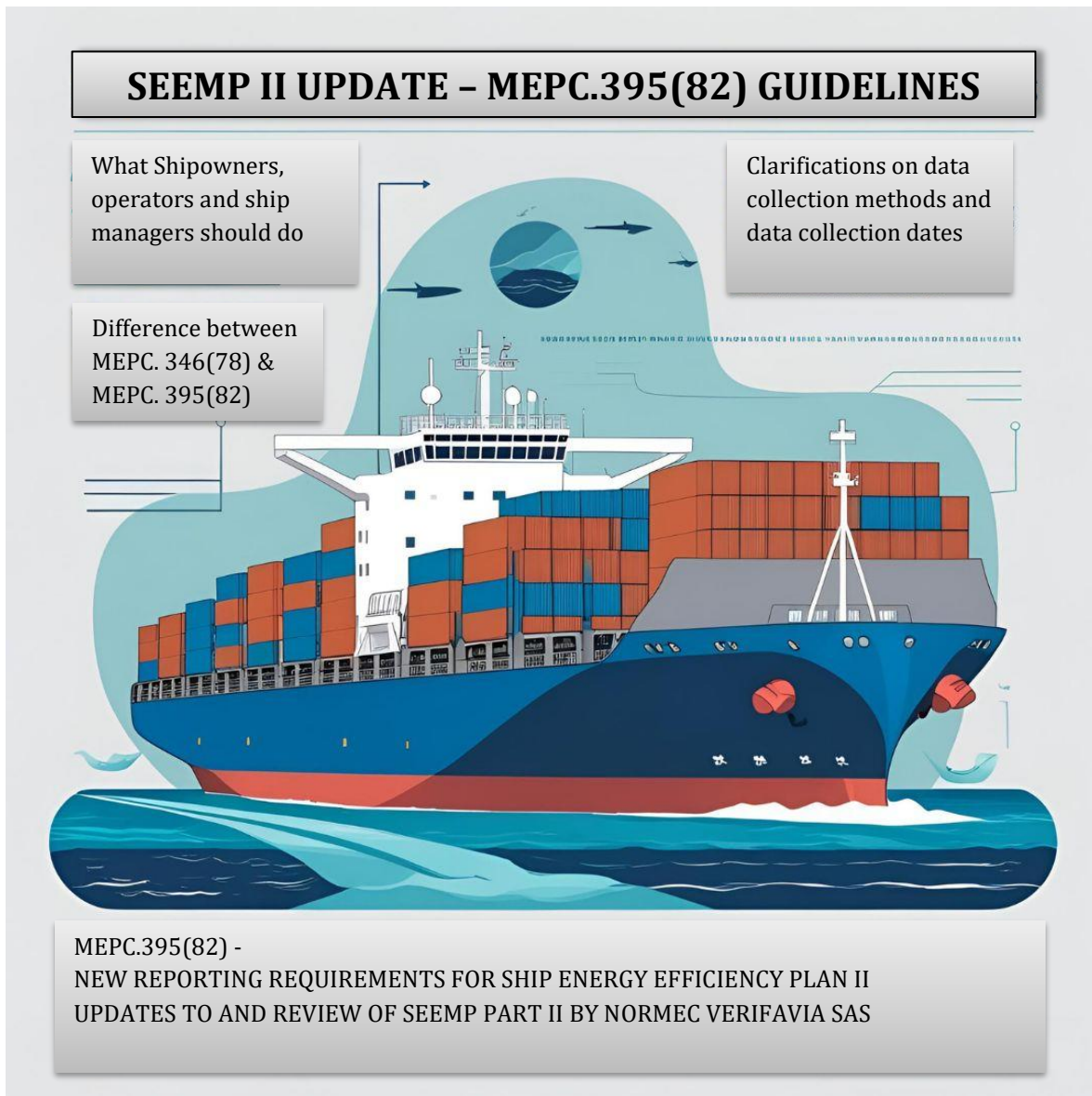




A Guidance document for Shipowners and Managers on Amendments to SEEMPs

Notice to: Shipowners / Managers / Operators

This Guidance document is issued to inform all concerned parties that the **International Maritime Organization (IMO)** has officially adopted [Resolution MEPC.395\(82\)](#), titled

“2024 Guidelines for the Development of a Ship Energy Efficiency Management Plan (SEEMP)”, on **04 October 2024**.

The **2024 Guidelines**, as detailed in the [Annex to MEPC.395\(82\)](#), introduce an updated framework for the preparation and structure of SEEMP, incorporating several new reporting elements and a standardized format to enhance consistency and verification efficiency.

Please note that the **2022 SEEMP Guidelines** have been **revoked** and are no longer applicable. All ship operators and concerned stakeholders are advised to review the new requirements and ensure compliance ahead of the upcoming reporting period

Introduction

To support the shipping industry’s transition to a low-carbon future, the IMO has continuously strengthened its regulatory framework on fuel consumption monitoring and energy efficiency. One of the most significant updates to this framework came during the 82nd session of the Marine Environment Protection Committee (MEPC), where Resolution [MEPC.395\(82\)](#) was adopted.

SEEMP Part II, as outlined in [MEPC.395\(82\)](#), is required to enhance the accuracy and transparency of fuel oil consumption reporting for ships. This regulation is part of the International Maritime Organization’s (IMO) broader strategy to reduce greenhouse gas emissions from international shipping.

Here’s why it’s important:

- **Expanded Data Collection:** Ships of 5,000 gross tonnage and above must now report detailed annual fuel consumption data, broken down by fuel type and emission sources (e.g., main engines, auxiliary engines), both while underway and not underway.
- **Regulatory Compliance:** SEEMP II is a mandatory component under MARPOL Annex VI Regulation 26.2, ensuring ships are aligned with Regulation 27’s data reporting standards.

Regulatory Evolution: From MEPC.346(78) to MEPC.395(82)

Here’s how SEEMP II regulations evolved over time:

MEPC.346(78) – 2022:

- Introduced the Carbon Intensity Indicator (CII) and SEEMP Part III.
- Signaled the need to restructure SEEMP II.

MEPC.395(82) – 2024:

- Introduced a uniform, detailed SEEMP II template.
- Added Transport Work, Power Demand at Berth, and Fuel by Emission Source as mandatory elements and reporting of BOSP & EOSP events

Collection of data for existing ships after 1 August 2025

Ships that hold a verified SEEMP Part II and are collecting the data within the current MARPOL Annex VI Appendix IX before 1 August 2025, are expected to continue collecting this data after 1 August 2025 until 31 December 2025. This is to ensure that the data collected and reported is consistent throughout the calendar year. In any case, these ships will be required to collect the additional data in the Annex to MEPC.395(82) from 1 January 2026.

Collection of data for new ships after 1 August 2025

For ships that enter service and start collecting data on or after 1 August 2025, it is expected that such ships will collect the data (including the additional data) in the Annex to MEPC.395(82) as they had not collected any data before the amendments entered force.

Key Additions in the New SEEMP II (MEPC.395(82))

1. Transport Work:

The revised **Appendix IX** has introduced a new requirement for **explicit cargo reporting** to facilitate accurate calculation of **transport work**. The definitions of cargo units have been harmonized with **IMO regulatory frameworks**.

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 $\sum_v (cargo_mass_v \times distance_v)$

2. Power Demand at Berth:

- Track average power use while at berth.
- Report berth duration and use of shore power.

3. Fuel by Emission Source:

- Separate reporting for main engines, auxiliary engines, and boilers, IGG etc.

4. Revised Definition of "Under Way" – MEPC 83 Update

- MEPC 83 revised the definition of "under way" to include mandatory reporting of BOSP (Begin of Sea Passage) and EOSP (End of Sea Passage) events.

Key Implications:

- EOSP must be reported when the ship slows down for activities like anchoring, STS transfers, or canal transits.
- BOSP is reported when the vessel resumes transit speed after such activities.
- For short voyages, if no sea passage is distinguishable, berth-to-berth reporting applies.
- Noon-only reporting is no longer acceptable — berth-to-berth event-based reporting is required for all ships.

Use Exact Event Tags:

- BOSP / BeginOfSeaPassage
- EOSP / EndOfSeaPassage
- FAOP / FullAheadOnPassage

Comparison of Old SEEMP II (As per [MEPC.346\(78\)](#)) vs. New SEEMP II Format (As per [MEPC.395\(82\)](#))

Aspects	Old SEEMP II Format	New SEEMP II Format MEPC.395(82)
Transport Work	Not mandatory	Cargo reporting is mandatory to calculate Transport Work
Power at Berth	Not mandatory	Mandatory (also includes average power & shore power usage)
Distance Travelled	Laden distance reporting is not mandatory	Laden distance should be calculated as the distance sailed when the vessel is loaded
Fuel Oil Consumption per consumer type	Not mandatory	Fuel consumption mandatory per fuel emission sources (ME, AE, Boilers and others)

Timeline for Implementation SEEMP II as per [MEPC.395\(82\)](#)

Milestone	Timeline / Deadline
Adoption of MEPC.395(82)	4 October 2024
Start the preparation of SEEMP II	From 1 August 2025
Submission of updated SEEMP II for approval	From 1 August 2025 to 31 December 2025
Effective date of new SEEMP II requirements	1 January 2026
Verified SEEMP II must be onboard	By 1 January 2026
Start of CII monitoring under updated SEEMP II	From 1 January 2026 onwards

Periodical Verification: SEEMP Part III

[SEEMP/CII Implementation Guidelines](#)

Every three years after initial verification

A SEEMP Part III should be revised (before the end of the last year in the Three-year implementation plan) and re-verified every three years (e.g. for a ship delivered prior to 1 January 2023, before 2026 for 2026-2028 period, before 2029 for 2029-2031 period)

In such as case, [section 7.1](#) of these Guidelines is to be referred for verification activities and supporting documentation. Additionally, section 2 of the revised SEEMP Part III is to be verified to ensure that CII values and rating of the previous three years are described.

Additional Verifications

Starting with the first CII verification in 2024, if a ship is rated as D for three consecutive years or E for one year, SEEMP Part III should be reviewed and updated by inclusion of corrective actions plan. The plan of corrective actions shall list additional measures and revised measures to be added to the three-year implementation plan necessary for achieving the required CII. The updated SEEMP Part III shall be submitted for re-verification

to ensure that a plan of corrective actions has been established in accordance with regulations 28.7 and 28.8 and re-issuance of the Confirmation of Compliance

Next Steps for Ship Operators – SEEMP II Compliance (MEPC.395(82))

1. Review SEEMP II

Check your existing SEEMP II for gaps. Ensure it includes energy efficiency measures, CII targets, monitoring plans, and baseline/target values.

2. Use Standard Template

Update SEEMP II using the new MEPC.395(82) format, covering ship details, OCI plan, data sources, and QA procedures.

3. Add New Requirements

- Power at berth reporting
- Fuel use by emission sources (main engine, aux, boiler etc)
- Log BOSP/EOSP events – Mark start/end of sea passages
- Alignment with SEEMP Part I & III

4. Submit to Normec Verifavia

Send your revised SEEMP II for review and verification to ensure compliance with IMO and MARPOL requirements.

5. Train Crew & Staff

Ensure personnel understand their roles in data collection and SEEMP implementation.

6. Get Approval Before 2026

Have the updated SEEMP II approved and onboard before the 2026 reporting year begins.

Role of Normec Verifavia SAS as a Verifier

Normec Verifavia SAS plays a key role in:

SEEMP II Review & Verification Summary:

1. Technical Review & Gap Analysis

- Assesses SEEMP II for structure, completeness, and compliance with IMO and flag requirements.
- Recommends improvements to ensure smooth flag approval.

2. Fuel & Data Source Verification

- Reviews fuel consumption breakdown for accuracy.
- Identifies discrepancies during the SEEMP review and, if any issues are detected, requests the operator to implement corrections.

3. Verification Statement Issuance

- Confirms compliance with MARPOL Annex VI Regulation 26.2, Resolution MEPC.347(78) and Resolution MEPC.395(82)
- Issues a Review Report to support COC issuance by the flag.

4. Client Support

- Provides guidance on regulatory updates and technical aspects like CII targets and corrective plans.

Conclusion

MEPC.395(82) strengthens SEEMP II with standardization, enhanced reporting requirements, and closer alignment with IMO's decarbonization goals. It mandates clearer documentation of fuel usage, power demand at berth, transport work, and corrective action plans for vessels with lower CII ratings.

Normec Verifavia SAS is well-positioned to guide shipowners and operators through this regulatory transition by offering expert verification, technical assessments, and ongoing compliance support. Our end-to-end services ensure that SEEMP II documents are not only compliant but also strategically aligned with long-term sustainability and operational efficiency objectives. We remain committed to supporting the maritime industry in achieving environmental compliance with confidence and clarity.