REPUBLIC OF
THE MARSHALL ISLANDS

MARPOL Annex VI, Chapter 4 –
Regulations on the Carbon Intensity of International Shipping

MARITIME ADMINISTRATOR

Rev. Jun/2025 **MN 2-013-12**

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REPUBLIC OF THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Notice

No. 2-013-12

Rev. Jun/2025

TO: **ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

SUBJECT: **MARPOL Annex VI, Chapter 4 – Regulations on the Carbon Intensity of International Shipping**

References:

(a) **MARPOL**, *International Convention for the Prevention of Pollution from Ships,* Consolidated Edition, 2022

(b) **IMO Resolution** MEPC.335(76), *2021 Guidelines on the shaft/engine power limitation system to comply with the EEXI requirements and use of a power reserve*, as amended by MEPC.375(80), adopted 7 July 2023

(c) **IMO Resolution** MEPC.346(78), *2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP)*, adopted 10 June 2022

(d) **IMO Resolution** MEPC.347(78), *Guidelines for the verification and company audits by the Administration of Part III of the SEEMP,* adopted 10 June 2022

(e) **IMO Resolution** MEPC.348(78), *2022 Guidelines for Administration verification of ship fuel oil consumption data and operational carbon intensity,* adopted 10 June 2022

(f) **IMO Resolution** MEPC.349(78), *2022 Guidelines for the development and management of the IMO Ship Fuel Oil Consumption Database,* adopted 10 June 2022

(g) **IMO Resolution** MEPC.350(78), *2022 Guidelines on the method of calculation of the attained Energy Efficiency Existing Ship Index (EEXI),* adopted 10 June 2022

(h) **IMO Resolution** MEPC.351(78), *2022 Guidelines on survey and certification of the attained Energy Efficiency Existing Ship Index (EEXI)*, adopted 10 June 2022

(i) **IMO Resolution** MEPC.352(78), *2022 Guidelines on operational carbon intensity indicators and the calculation methods (CII Guidelines, G1)*, adopted 10 June 2022

(j) **IMO Resolution** MEPC.354(78), *2022 Guidelines on the operational carbon intensity rating of ships (CII rating guidelines, G4),* adopted 10 June 2022

(k) **IMO Resolution** MEPC.355(78), *2022 Interim Guidelines on correction factors and voyage adjustments for CII calculations (CII Guidelines, G5)*, adopted 10 June 2022

(l) **IMO Resolution** MEPC.362(79), *amendments to the annex of the protocol of 1997 to amend the international convention for the prevention of pollution from ships, 1973, as modified by the protocol of 1978 relating thereto; Amendments to MARPOL Annex VI (Regional reception facilities within Arctic waters, information to be included in the bunker delivery note (BDN) and information to be submitted to the IMO Ship Fuel Oil Consumption Database),* adopted 16 December 2022

(m) **IMO Resolution** MEPC.364(79), *2022 Guidelines on the method of calculation of the attained Energy Efficiency Design Index (EEDI) for new ships*, adopted 16 December 2022

(n) **IMO Resolution** MEPC.365(79), *2022 Guidelines on survey and certification of the Energy Efficiency Design Index (EEDI)*, as amended by MEPC.374(80), adopted 7 July 2023

(o) **IMO Circular** MEPC.1/Circ.795/Rev.8, *Unified interpretations to MARPOL Annex VI*, issued 24 July 2023

(p) **IMO Circular** MEPC.1/Circ.876, *Sample format for the confirmation of compliance, early submission of the SEEMP Part II on the ship fuel oil consumption data collection plan and its timely verification pursuant to Regulation 5.4.5 of MARPOL Annex VI*, issued 16 April 2018

(q) **IMO Circular** MEPC.1/Circ.896, *2021 Guidance on treatment of innovative energy efficiency technologies for calculation and verification of the attained EEDI and EEXI*, issued 14 December 2021

(r) **IMO Circular** MEPC.1/Circ.901, *Guidance on methods, procedures and verification of in-service performance measurements*, issued 24 June 2022

(s) **IMO Circular** MEPC.1/Circ.905**,** *Interim guidance on the use of biofuels under regulations 26, 27 and 28 of MARPOL Annex VI (DCS and CII)***,** issued 24 July 2023

(t) **IACS** Procedural Requirement 38 Rev.4, *Procedure for calculation and verification of the Energy Efficiency Design Index (EEDI)*

(u) **IACS** Recommendation 172, *EEXI Implementation Guidelines*

PURPOSE

This Marine Notice (MN) clarifies the regulations on the carbon intensity of international shipping (MARPOL Annex VI, Chapter 4) for Republic of the Marshall Islands (RMI)-flagged ships. It supersedes Rev. Feb/2024. Section 3.2.3a(4) has been revised to clarify the Shaft Power Limitation (SHaPoLi) / Engine Power Limitation (EPL) system reactivation and replacement process.

BACKGROUND

The RMI is signatory to MARPOL Annex VI, which entered into force 19 May 2005. MARPOL Annex VI, Chapter 4 regulates the carbon intensity of international shipping by introducing technical and operational carbon intensity requirements for new and existing ships.

APPLICABILITY

The MARPOL Annex VI, Chapter 4 requirements apply to:

- all RMI-flagged ships of 400 gross tonnage (GT) and above. This includes passenger yachts (PAXYs) (see §3.1.1e).

They do **not** apply to:

- ships not engaged in transport work including those not propelled by mechanical means and platforms including Floating Production, Storage and Offloading Facilities (FPSOs), Floating Storage Units (FSUs), Floating (Storage) and Regasification Units (FRU or FSRUs), Floating Liquified Natural Gas (FLNG), and drilling rigs, regardless of their propulsion; or

- where expressly provided otherwise in MARPOL Annex VI, Regulation 19, or this MN.

REQUIREMENTS

1.0 Definitions

1.1 MARPOL Annex VI, Regulation 2 defines the terms for Chapter 4, including:

.1 new ships;

.2 major conversions;

.3 ships delivered on or after 1 September 2019; and

.4 existing ships.

1.2 Regarding the various ship types defined in MARPOL Annex VI, Regulation 2 and as used in Chapter 4, a ship not falling into any of the ship types is considered a "*Ship other than ship types defined in Regulation 2.*"

1.3 The MARPOL Annex VI, Regulation 2 definitions must be read in conjunction with the Unified Interpretations to MARPOL Annex VI (International Maritime Organization (IMO) Circular MEPC.1/Circ.795/Rev.8).

2.0 Survey and Certification

2.1 All ships of 400 GT and above to which this MN applies must undergo surveys as specified in MARPOL Annex VI, Regulation 5.4.

2.2 The Administrator has delegated the survey and certification functions associated with MARPOL Annex VI, Chapter 4 to its Recognized Organizations (ROs) that are authorized to issue:

.1 an **International Energy Efficiency Certificate** (IEEC) and supplement after completion of the surveys in MARPOL Annex VI, Regulation 5.4. For IEEC issuance the RO must perform a verification of the:

a. attained EEDI,[1] or attained EEXI[2] accompanied by their Technical File (TF) containing the information necessary for the calculated values for each ship;

b. SEEMP for compliance with MARPOL Annex VI, Regulation 26.

c. EEDI TF for Liquefied Natural Gas (LNG) carriers delivered before 1 September 2019, when reissuing the IEEC during the first periodical survey on or after 1 January 2023. See IACS Rec. 172, §7 for the treatment of LNG carriers; and

d. corresponding ship type for MARPOL Annex VI to be marked in the IEEC Supplement.

.2 the IEEC remains valid for the lifetime of the ship, except for the cases specified under MARPOL Annex VI, Regulation 9.11 (ship withdrawn from service, major conversion, or upon transfer of the ship to the flag of another State);

.3 a **Confirmation of Compliance (CoC)** when it is ensured by verification that the SEEMP Part II or Part III contains the required methodologies and processes (see §4.1 of this MN); and

.4 an annual renewable **Statement of Compliance** (SoC) after satisfactory verification of annual data related to fuel oil consumption reporting, and operational intensity rating. The RO must transfer data into the IMO Ship Fuel Oil Consumption Database (see §4.2 and §4.3 of this MN).

a. As required by MARPOL Annex VI, Regulation 9.12, an SoC issued according to Regulation 6.6 will be valid for the calendar year in which it was issued and for the first five months of the subsequent year, therefore up to 17 months.

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[1] See IMO Resolution MEPC.365(79), as amended by MEPC.374(80).
[2] See IMO Resolution MEPC.350(78).

b. In the event of a transfer, an SoC issued according to Regulation 6.7 will be valid for the calendar year in which it is issued, for the following calendar year, and for the first five months of the subsequent calendar year (up to 29 months).

c. All SoCs must be kept on board for at least five years.

3.0 Technical Carbon Intensity

Technical carbon intensity requirements[3] for ships may vary for EEDI[4] and EEXI.[5]

3.1 Attained and required EEDI (MARPOL Annex VI, Regulations 22 and 24)

.1 The attained EEDI

a. The attained EEDI is defined under Regulation 2.2.3 as the EEDI value achieved by an individual ship in accordance with MARPOL Annex VI, Regulation 22.

b. The attained EEDI must be calculated for each:

(1) new ship;

(2) new ship that has undergone a major conversion; and

(3) new or existing ship which has undergone a major conversion so extensive that it is regarded by the Administrator as newly constructed.

c. Only ships of 400 GT and above which fall into one or more of these categories in the table below are required to have an attained EEDI calculated.

Regulation	Type
2.2.5	bulk carrier
2.2.7	combination carrier
2.2.9	containership
2.2.11	cruise passenger ship

[3] Per Regulation 19.3, EEDI and EEXI requirements do not apply to certain ships having conventional or non-conventional propulsion, and category A ships as defined in the International Code for Ships Operating in Polar Waters (Polar Code).

[4] Regulations 22 and 24 apply to: cruise passenger ships ≥ 25,000 GT having non-conventional propulsion; and LNG carriers having conventional or non-conventional propulsion, delivered on or after 1 September 2019, as defined in Regulation 2.2.1.

[5] Regulations 23 and 25 apply to: cruise passenger ships ≥ 25,000 GT having non-conventional propulsion; and LNG carriers having conventional or non-conventional propulsion.

Regulation	Type
2.2.14	gas carrier
2.2.15	general cargo ship
2.2.16	LNG carrier
2.2.20	passenger ship
2.2.22	refrigerated cargo carrier
2.2.26	ro-ro cargo ship
2.2.27	ro-ro cargo ship (vehicle carrier)
2.2.28	ro-ro passenger ship
2.2.29	tanker

d. The attained EEDI value for a new or converted ship must be:

(1) calculated specifically for each ship, in accordance with the 2022 IMO Guidelines (see IMO Resolution MEPC.364(79));

(2) verified by the RO[6] based on the EEDI TF;

(3) reported by the RO together with the required EEDI value and related information into the IMO Global Integrated Shipping Information System (GISIS) EEDI Information Database as follows:

(i) within seven months of completing surveys in MARPOL Annex VI, Regulation 5.4; or

(ii) within seven months following 1 April 2022 for a ship delivered prior to 1 April 2022; and

(4) less than or equal to the required EEDI value in accordance with MARPOL Annex VI, Regulation 24.1.

(5) In the case of a ship equipped with a dual-fuel engine, the type of **primary fuel** must be indicated when submitting information into the IMO GISIS EEDI Information Database (see Appendix 5, footnote 11 of IMO Resolution MEPC.364(79)).

e. A PAXY that carries a passenger ship safety certificate (PSSC) on board is considered a passenger ship. MARPOL Annex VI, Regulation 22 on attained EEDI values applies to PAXYs that carry a PSSC. The type of ship must be marked as a passenger ship in the supplement to the IEEC.

[6] See IMO Resolution MEPC.365(79) as amended by MEPC.374(80) and IACS PR38 Rev.4.

.2 The required EEDI

a. The required EEDI is defined under Regulation 2.2.24 as the maximum value for the attained EEDI that is allowed by Regulation 24 for a specific ship type and size.

b. The attained EEDI must be less than or equal to the relevant required EEDI value. This only applies for each new ship (or existing ship which has undergone a major conversion so extensive that the ship is regarded as a newly constructed ship), which falls into one or more of the categories as per the table below:

Regulation	Vessel Type	Size (deadweight tonnage (DWT) / GT)
2.2.5	bulk carrier	≥ 10,000 DWT
2.2.7	combination carrier	≥ 4,000 DWT
2.2.9	containership	≥ 10,000 DWT
2.2.11	cruise passenger ship	≥ 25,000 GT
2.2.14	gas carrier	≥ 2,000 DWT
2.2.15	general cargo ship	≥ 3,000 DWT
2.2.16	LNG carrier	≥ 10,000 DWT
2.2.22	refrigerated cargo carrier	≥ 3,000 DWT
2.2.26	ro-ro cargo ship	≥ 1,000 DWT
2.2.27	ro-ro cargo ship (vehicle carrier)	≥ 10,000 DWT
2.2.28	ro-ro passenger ship	≥ 250 DWT
2.2.29	tanker	≥ 4,000 DWT

c. The EEDI provisions in MARPOL Annex VI, Regulation 24.5 require that each ship, to which Regulation 24 applies, has sufficient installed propulsion power to maintain its maneuverability in adverse conditions. For guidance see IMO Circular MEPC.1/Circ.850/Rev.3, *2013 Interim guidelines for determining minimum propulsion power to maintain the maneuverability of ships in adverse conditions*. Rev.3 extends the application of the Guidelines to EEDI phase 2 requirements.

d. Table 1 of MARPOL Annex VI, Regulation 24 introduces strengthened required EEDI values through additional columns for Phases 2 and 3 corresponding to reduction factors for certain ships.

e. Where the design of a ship falls into more than one defined category, it must be considered as being the ship type with the most stringent (the lowest) required EEDI.

3.2 Attained and Required EEXI (MARPOL Annex VI, Regulations 23 and 25)

.1 The attained EEXI regulation applies to each ship of 400 GT and above, and whose ship type falls into one or more of the categories in MARPOL Annex VI Regulations:

Regulation	Vessel Type
2.2.5	bulk carrier
2.2.7	combination carrier
2.2.9	containership
2.2.11	cruise passenger ship
2.2.14	gas carrier
2.2.15	general cargo ship
2.2.16	LNG carrier
2.2.22	refrigerated cargo carrier
2.2.26	ro-ro cargo ship
2.2.27	ro-ro cargo ship (vehicle carrier)
2.2.28	ro-ro passenger ship
2.2.29	tanker

.2 The attained EEXI value for each ship must be:

a. calculated in accordance with IMO Resolution MEPC.350(78) (in cases where not all static data is available, IMO Circular MEPC.1/Circ.901 may be used);

b. verified by the RO based on an EEXI TF, by the first annual, intermediate, or renewal survey for the International Air Pollution Prevention Certificate on or after 1 January 2023 (see IMO Resolution MEPC.351(78) for the verification of the attained EEXI); and

c. less than or equal to the required EEXI value, in accordance with MARPOL Annex VI, Regulation 25.1.

.3 For complying with EEXI a ship may be provided with:

a. SHaPoLi / EPL systems.

Ships may be equipped with a SHaPoLi / EPL system as per guidance contained in IMO Resolution MEPC.335(76), as amended by MEPC.375(80), to comply with regulations on **required EEXI** provided that:

(1) the applied SHaPoLi / EPL systems are verified, and that a system for overriding power limitation is approved by the RO;

(2) an Onboard Management Manual is verified by the RO after a survey verifying the ship's attained EEXI, as required by Regulation 5.4 of MARPOL Annex VI;

(3) a technical means is provided to be capable of using the power reserve by un-limiting the shaft/engine power limitation for securing the safety of a ship or saving life at sea. When power reserve is used, the ship must maintain a record and notify without delay:

(i) the Administrator at technical@register-iri.com by submitting a completed notification Form TEC-30 E or the RO; and

(ii) the competent authority of the relevant port of destination;

(4) when applicable, the Administrator or the vessel's RO must confirm that the SHaPoLi / EPL system has been properly reactivated or replaced, to their satisfaction, at the earliest opportunity. This verification may take place through Remote Survey without specific authorization from the Administrator; and

(5) corresponding manoeuvring information is on the navigating bridge for watchkeepers and pilots.

b. Innovative energy efficiency technologies.

For compliance with **attained EEDI and EEXI** values with respect to energy saving devices see IMO Circular MEPC.1/Circ.896. It provides the methodology for calculations and verification when using innovative energy efficiency (electrical or mechanical) technologies such as:

(1) air lubrication systems on the ship's bottom;

(2) wind-assisted propulsion system;

(3) waste heat recovery systems for generation of electricity; and

(4) photovoltaic solar power generation systems.

4.0 Operational Carbon Intensity

4.1 **SEEMP** (MARPOL Annex VI, Regulation 26)

.1 Ships of 400 GT and above, with certain exceptions,[7] must keep on board a ship-specific SEEMP. This may be a stand-alone document, or it may form part of the ship's Safety Management System. The SEEMP must be developed taking into account the guidance contained in IMO Resolution MEPC.346(78).

SEEMP	Plan	Applicability
Part I	The ship management plan to improve the energy efficiency	all ships of 400 GT and above, regardless of type
Part II	The fuel oil consumption data collection plan	all ships 5,000 GT and above, regardless of type
Part III	The ship operational carbon intensity plan	for ships 5,000 GT and above falling into one or more of the categories in MARPOL Annex VI Regulations: 2.2.5, 2.2.7, 2.2.9, 2.2.11, 2.2.14 – 2.2.16, 2.2.22, and 2.2.26 – 2.2.29

.2 Each ship to which MARPOL Annex VI, Regulation 26.3.1 applies must develop a SEEMP Part III and have it verified by the RO. The SEEMP must include:

a. methodologies to calculate the ship's attained annual operational carbon intensity indicator (CII) using methods in IMO Resolution MEPC.352(78) and the processes to report this value;

b. the required annual operational CII, as specified in MARPOL Annex VI Regulation 28, for the next three years;

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

d. a procedure for self-evaluation and improvement.

[7] With respect to ships required to keep a SEEMP on board, such ships exclude platforms (including FPSOs and FSUs) and drilling rigs, regardless of their propulsion, and any other ship without means of propulsion (see IMO Circular MEPC.1/Circ.795/Rev.8).

.3 A CoC may be issued for a compliant SEEMP Part II or Part III for retention on board the ship. A CoC remains valid for the lifetime of the ship, except when:

a. the IEEC becomes invalid for the cases specified in Regulation 9.11; and/or

b. a ship is changing Company or changing from one Administration to another and from one Company to another concurrently. After 1 January 2023, a ship undergoing such a change must comply with Regulation 26.3.1 at change of Company and a new SEEMP III will be required (see IMO Circular MEPC.1/Circ.795/Rev.8, unified interpretation 19.2).

.4 The CoC for a verified SEEMP:

a. Part II must reflect the format provided in IMO Circular MEPC.1/Circ.876; and

b. Part III must reflect the format provided in the Annex of IMO Resolution MEPC.347(78).

.5 Verification and Audit

a. Per MARPOL Annex VI, Regulation 26.3.3 and taking into consideration IMO Resolution MEPC.347(78), the verification and audit process for the SEEMP must include a periodical verification to ensure that the SEEMP continues to comply with regulation 26.3.1.

b. MARPOL Annex VI Regulation 26.3.3 also requires that the SEEMP is subject to Company audits for ships required to comply with MARPOL Annex VI, Regulation 28. This means that each Company must undergo an audit once every three years. The three-year cycle is the SEEMP Part III revision cycle associated with the ship(s).

4.2 Collection and reporting of ship fuel oil consumption data (Regulation 27)

.1 Data Collection

a. All ships of 5,000 GT and above[8] must collect the data specified in MARPOL Annex VI, Appendix IX[9] for that calendar year and each subsequent calendar year or portion thereof. The data must be collected according to the methodology specified in Part II of the SEEMP.

[8] See IMO Resolution MEPC.349(78), §6 and MARPOL Annex VI, Regulation 27.9.

[9] Boil-off gas consumed for propulsion or operation (in a boiler or a Gas Combustion Unit for cargo tank pressure control or other operational purposes) must also be collected and reported (see IMO Circular MEPC.1/Circ.795/Rev.8).

b. At the end of each calendar year, or in the event of a change of flag or Company as described in §4.2.2b below, the data collected in that calendar year, or portion thereof as appropriate, must be aggregated for reporting purposes.

c. The disaggregated data collected must be kept readily accessible and be made available to the RO upon request for a period of not less than 12 months from the end of the calendar year in which the data was collected. In the event of a transfer from the RMI to another flag, or change of Company, the disaggregated data is not required to be kept on board the ship provided that the disaggregated data can be made available by the Company (see Unified Interpretation 16.1 in IMO Circular MEPC.1/Circ.795/Rev.8).

.2 Data Reporting

a. Within three months after the end of each calendar year, aggregated values for each datum specified in MARPOL Annex VI, Appendix IX[10] must be reported to the RO electronically, following the reporting process specified in the SEEMP, Part II.

b. In the event of a transfer from the RMI to another flag, or change from one Company to another, within a calendar year, the ship must report to the RO the aggregated data for the relevant portion of that calendar year on the day of completion of the transfer/change, or as close as practical thereto. The associated disaggregated data must also be provided when requested by the RO.

c. All reports must be submitted utilizing the standardized data reporting format for the data collection system (DCS), provided under Appendix 3 of IMO Resolution MEPC.346(78). For the reporting of a fuel type that does not fall into one of the categories that are described in the 2022 EEDI guidelines (IMO Resolution MEPC.364(79)) the following applies:

(1) the fuel oil supplier must provide a Conversion Factor (C_f) for the respective product supported by documentary evidence in accordance with IMO guidelines (IMO Resolution MEPC.346(78));

[10] Amendments to Appendix IX of MARPOL Annex VI in IMO Resolution MEPC.362(79) enter into force 1 May 2024.

(2) for biofuels, proof of sustainability or similar documentation from a recognized scheme must be provided along with the bunker delivery note, in accordance with interim guidance (IMO Circular MEPC.1/Circ.905); and

(3) biofuels not certified as ″sustainable″ or not fulfilling the well-to-wake emission factor criterion specified in IMO Circular MEPC.1/Circ.905 will be assigned a C_f value equal to the C_f of the equivalent fossil fuel type.

.3 Data Verification

a. All data reported in accordance with §4.2.2a above must be verified by an RMI authorized RO as required by MARPOL Annex VI, Regulation 27.7, taking into account IMO Resolution MEPC.348(78).

(1) The verification of data reported in accordance with §4.2.2a must be completed no later than five months after the end of the previous calendar year.

(2) The verification of data reported in accordance with §4.2.2b must be completed no later than two months after receipt of the reported data.

b. An SoC, corresponding to the form provided under Appendix X of MARPOL Annex VI, must be issued after successful completion of the relevant verification referred to in §4.2.3a above.

c. The RO must transfer that reported data into the IMO Ship Fuel Oil Consumption Database (IMO DCS) no later than one month after issuing the SoC.

.4 Notification of changes relevant to Ship Fuel Oil Consumption Data Reporting

Any time an RO is designated to submit data or there is a change in vessel status relevant to §4.2.2b, RMI Form MI-296 must be completed and submitted to the Administrator via email at DCS@Register-IRI.com.

4.3 Operational carbon intensity[11] (MARPOL Annex VI, Regulation 28)

.1 Attained and required annual operational CII

a. After the end of calendar year 2023 and after the end of each following calendar year, each ship of 5,000 GT and above which falls into one or more of the categories in MARPOL Annex VI, Regulations 2.2.5, 2.2.7, 2.2.9, 2.2.11, 2.2.14 – 2.2.16, 2.2.22, and 2.2.26 – 2.2.29 must calculate the:

(1) **attained annual operational CII** value using methods in IMO Resolution MEPC.352(78). It must be calculated over a 12-month period from 1 January to 31 December for the preceding calendar year, using the data collected in accordance with §4.2 above; and

(2) **required annual operational CII** value.

b. Within three months after the end of each calendar year, the ship must report the attained annual operational CII to its RO.

c. When a ship transfers from the RMI to another flag, or changes from one Company to another, the attained annual operational CII must be calculated for the full 12-months (1 January to 31 December). This must be done in the calendar year during which the transfer took place, in accordance with MARPOL Annex VI, Regulations 6.6 and 28.3. For reporting on fuel oil consumption data see §4.2.2b of this MN.

.2 Operational carbon intensity rating

a. The attained annual operational CII must be documented and verified against the required annual operational CII to determine the operational carbon intensity rating, in accordance with MARPOL Annex VI, Regulation 28.6.

b. Per IMO Resolution MEPC.354(78) the established ratings are:

	Performance Level
A	major superior
B	minor superior
C	moderate
D	minor inferior
E	inferior

c. See IMO Resolution MEPC.355(78) for correction factors and voyage adjustments for CII calculations.

[11] Regulation 28 **does not apply** to category A ships as defined in the Polar Code.

d. See IMO Resolution MEPC.338(76) for the annual operational carbon intensity reduction factors and their concrete values from year 2023 to 2030; also refer to MARPOL Annex VI, Regulations 28.4 and 28.11.

e. After determination that the data is in accordance with MARPOL Annex VI, Regulations 27 and 28 the RO must issue an SoC related to fuel oil consumption reporting and operational carbon intensity rating to the ship no later than five months from the beginning of the calendar year.

.3 Corrective actions and incentives

a. A ship rated as D for three consecutive years or rated as E for one year must develop a ***plan of corrective actions***[12] to achieve the required annual operational CII (MARPOL Annex VI, Regulation 28.7).

b. A revised SEEMP including the plan of corrective actions for CII reduction, must be **submitted to the RO for *verification***[13,14,15] in no case later than one month after reporting the attained annual operational CII as required by MARPOL Annex VI, Regulation 28.8.

c. On satisfactory verification of the plan of corrective actions, the RO may issue the SoC according to Regulation 6.8 of MARPOL Annex VI.

d. Ships rated as D for three consecutive years or rated as E must undertake the planned corrective actions in accordance with the revised SEEMP.

.4 Dates for collection and reporting of Ship Fuel Oil Consumption Data and Operational Carbon intensity are consolidated in Appendix A below.

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12 For developing a *plan of corrective actions* refer to §15 of IMO Resolution MEPC.346(78).

13 The company must ensure that the SEEMP is ***reviewed*** and ***updated*** as per §9.10 and §14 of IMO Resolution MEPC.346(78).

14 Per IMO Circular MEPC.1/Circ.795/Rev.8: *"*In case an inferior rating is given for data collected in calendar year YYYY, the revised SEEMP, including the plan of corrective actions, must be **verified** in year YYYY+1, and it should be developed to achieve the required annual operational CII for data collected in the calendar year YYYY+2.*"*

15 For the elements of verification refer to §6 of IMO Resolution MEPC.347(78).

APPENDIX A

Note: All regulations in this table refer to those in MARPOL Annex VI.

	IMO DCS (Regulation 27)	**Operational Carbon Intensity** (Regulation 28)
Entry into force	March 2018	November 2022
SEEMP review, or verification by:	31 December 2018 and issuance of a CoC (Regulation 5.4.5)	- On or before **1 January 2023** to include a '*ship operational carbon intensity plan,*' and the issuance of a CoC (Regulation 5.4.6).[16] - 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 (see MEPC.346(78)).
First monitoring period begins:	1 January 2019 (Regulation 27.1)	**1 January 2023** (Regulations 28)
First data reporting period and subsequent reporting:	1 January 2020, and each year thereafter (Regulation 27.2)	**1 January 2024** (Regulations 28.2, 28.3)
Shipowner Reports	- the RO must receive data by 31 March each year (Regulation 27.3) - the Administrator in the event of a transfer (see §4.2.4 (Regulation 27.8)	- the RO attained annual operational CII information and ships rating **by 31 March 2024** and each year thereafter (Regulations 28.2). - the Administrator in the event of a transfer. See §4.3.1.c (Regulation 28.3).
Ships to carry a SoC on board	SoC following verification no later than 31 May 2020, annual renewable (Regulation 6.6.4)	- no later than **31 May 2024** (Regulation 6.6.4). - **promptly** in the event of a transfer. (Regulations 6.7, 27.8, 28.3).

[16] See IMO Circular MEPC.1/Circ.795/Rev.8.