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26 November 2025

To: Shipowners, Ship Managers, Masters and Recognized Organizations of Hong Kong-Registered Ships

Dear Sir/Madam,

MARPOL Annex VI on Carbon Intensity Indicator (CII), Energy Efficiency Existing Ship Index (EEXI), Data Collection System for Fuel Oil Consumption (IMO DCS) and Ship Energy Efficiency Management Plan (SEEMP) Part II and Part III

Further to our circular letter issued on 31 July 2025 regarding the latest amendments to MARPOL Annex VI (Annex VI) adopted by resolution MEPC.385(81) and in accordance with MEPC.1/Circ.913¹, before 1 January 2026, SEEMP on board all Hong Kong registered ships of 5,000 gross tonnage and above shall be revised to include a description of the methodology intended for collecting data with enhanced granularity. Data shall be collected and reported with enhanced granularity from 1 January 2026 and beyond.

2. To ensure compliance with Annex VI, shipowners and ship managers of Hong Kong registered ships are reminded of the following key obligations:

i. SEEMP

- All ships of 400 gross tonnage and above engaged on international voyages shall maintain onboard a SEEMP, in accordance with regulation 26 of Annex VI as amended.

ii. SEEMP Part II

- All Hong Kong registered ships of 5,000 gross tonnage and above engaged on international voyages (i.e. the applicable ships) shall report annually their fuel oil consumption data of the preceding calendar year to the **Recognized Organization (RO)**² authorized by Hong Kong Marine Department (HKMD), in accordance with regulation 27 of Annex VI as amended.

¹ For the details of the [MEPC.385\(81\)](#), [MEPC.1/Circ.913](#) and [MEPC.1/Circ.795/Rev.9](#) please refer to Hong Kong Merchant Shipping Information Note (MSIN) [58/2024](#), [16/2025](#) and [65/2024](#) on the website of the Marine Department (<https://www.mardep.gov.hk/en/legislation/notices/msin/index.html>)

² For the list of Recognized Organizations, please refer to our Marine Department website. (<https://www.mardep.gov.hk/en/faq/services-for-cargo-ships-registered-in-hong-kong/survey-audit-and-certification-arrangements/index.html>)

- An applicable ship shall develop a Part II in its SEEMP to include the ship fuel oil consumption data collection plan and have it verified by the RO. Upon successful verification, the RO will issue a “Confirmation of Compliance” (CoC) for SEEMP Part II for retention onboard.

iii. Collection and Reporting of Ship Fuel Oil Consumption Data

- Collected fuel consumption data, as specified in Appendix IX of Annex VI, shall be submitted to the RO **within three months after the end of each calendar year**.
- In the event of **flag out, change of Company** to another, or both concurrently, the ship shall promptly report the data for the portion of the calendar year to the RO on or as close as possible to the day of completion of transfer.
- ROs shall verify the reported data and transfer to the IMO Ship Fuel Oil Consumption Database (IMO DCS) via Global Integrated Shipping Information System (GISIS) in **June or earlier each year**.

iv. Annual Operational CII, CII Rating and SEEMP Part III

- Regulation 28 of Annex VI as amended requires that an applicable ship shall calculate its attained annual operational carbon intensity indicator (CII) for the preceding calendar year based on annual fuel consumption data collected and report to the RO within three months after the end of each calendar year. The RO shall then verify and determine the operational carbon intensity rating (CII Rating), and issue “Statement of Compliance” (SoC) to the applicable ship by the end of May each year.
- An applicable ship shall develop a Part III in its SEEMP to include the ship operational carbon intensity plan, comprising CII calculation methodology, the required annual operational CII together with the implementation plan **for the next 3 years**, and procedure for self-evaluation and improvement. SEEMP Part III shall be submitted and verified by the RO. Upon successful verification, the RO will issue a CoC for SEEMP Part III for retention onboard.
- In the event of **flag out, change of Company** to another, or both concurrently, a new SEEMP Part III will be required. The year of change should be the first year of the next three-year implementation plan, in accordance with MEPC.1/Circ.795/Rev.9 as amended.
- According to regulation 26.3.3 of Annex VI and MEPC.347(78)³ as amended, in every three years, SEEMP shall be verified by the RO to ensure compliance with regulation 26.3.1 of Annex VI. ROs shall perform periodical company audits which may include company audits and shipboard audits during the three-year cycle, and if undertaken, shall be within six months after the issuance of SoC.
- In the case of an applicable ship attained a CII rating “D” for three consecutive years or a CII rating “E” for a year, the ship shall develop a corrective actions plan and include it in the SEEMP. The revised SEEMP shall be submitted to the RO for verification within one month after reporting the attained annual operational CII to the RO. A SoC shall not be issued unless the verification is satisfactory.

v. CII Performance and Corrective Action

- In accordance with regulations 28.7 and 28.8 of Annex VI, ships rated “E” in any single year or “D” for three consecutive years shall develop a Corrective

³ For the details of [MEPC.347\(78\)](#), please refer to MSIN [02/2023](#).

Action Plan within its SEEMP Part III and submit it to the RO for verification within one month after reporting the attained annual operational CII to the RO. A SoC shall not be issued unless the verification is satisfactory.

3. SEEMP Part II and Part III shall be reviewed and verified by a RO. HKMD accepts all our ROs to carry out the relevant works, not limited to their classed ships. However, the whole IMO DCS process shall be carried out by the **same RO**, including issuance of the CoC after verification of ship's SEEMP, issuance of the SoC after verification of fuel oil consumption data and CII, uploading the data to IMO and conducting company audits in relation to SEEMP.

4. The RO reviewing SEEMP that may form part of the ship's Safety Management System, shall receive the ship's data, verify the data for compliance with the requirements, verify the attained annual operational CII against the required annual operational CII, determine the operational carbon intensity rating, carry out ship and company audits, issue the SoC and CoC, submit the data to the IMO, and perform other related actions, according to Chapter IV of Annex VI.

5. Pursuant to resolution MEPC.347(78), SEEMP implementation verification on board may be combined with ISM audits. Pursuant to resolution A.1188(33), ROs shall contact the Administration for authorization on a case-by-case basis if a remote ISM audit is deemed necessary, since not all audit and verification activities are eligible for the use of remote methods. The in-person attendance is essential to ensure compliance and maintain standards.

6. This Circular supersedes the preceding Circulars dated 18 July 2018, 29 October 2021, and 17 November 2022. Shipowners, Ship Managers, Ship Operators, Masters and Recognized Organizations (Classification Societies) are advised to note the information provided in the documents and act accordingly.

7. Should you have any queries, questions, please feel free to contact Senior Surveyor of Cargo Ships Safety Section at

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Yours faithfully,

(No signature on website copy)

(H.F. YUE)

Senior Surveyor of Ships/Cargo Ships Safety
for Director of Marine