

Frequently Asked Questions Enhanced IMO DCS Reporting & SEEMP Updates

1. What are the deadlines for updating SEEMP Part II and III?

Existing ships shall have onboard the new Confirmations of Compliance for SEEMP Part II and III by 1 January 2026, and new ships delivered after 1 August 2025 by the date of delivery. A revised SEEMP Part II and III should be developed and submitted for review by 31 August 2025 allowing time to complete the review process.

2. The ship was delivered in 2025 before August. Should it collect data with enhanced level of granularity from 1 August 2025?

No, if the ship was delivered before 1 August 2025 the requirement for collecting data with enhanced level of granularity applies from 1 January 2026 unless the ship is flying the flag of an Administration that implements the amendments early.

3. Should ships subject only to Regulation 27 requirements (DCS) also report cargo carried?

No, the requirement to report cargo carried and subsequently the total transport work is applicable only for ships subject to Regulation 28 on the reporting of annual operational Carbon Intensity Indicator (CII).

4. Is the distance between FAOP and EOSP included only for calculating the attained CII?

No. All ships subject to Regulation 27 are required to measure and report distance travelled from FAOP to EOSP. This replaces the previous distance travelled “while the ship is under way under its own propulsion” term.

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5. If the SEEMP Part III currently in place has a Corrective Action Plan (CAP) including the required CII for the next years, does it need to be revised?

If the current SEEMP Part III already includes the required CII for 2026, its revision may be carried out in 2026.

6. Is the incinerator considered a fuel consumer, for which the fuel consumption shall be reported?

Yes, incinerators are also to be included as fuel consumers and a method to measure their fuel consumption by fuel oil type shall be developed and implemented.

7. In the event of anchorage before berth how will the distance travelled between anchorage and berth be reported?

The reporting will depend on whether the period after the anchorage until berth is a “not under way” period or it includes an “under way” period. If the ship did not reach transit speed after the anchorage, the distance travelled from anchorage to berth is not to be included in the aggregated data of distance travelled for the reporting period. If the ship reached transit speed after the anchorage, the distance travelled between FAOP and EOSP after the anchorage is to be included in the aggregated data of distance travelled for the reporting period.

8. How is the transport work of a voyage calculated in the case of STS operations?

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For voyages involving STS operations, the transport work shall be calculated as a weighted average.

9. Can the total consumption by fuel oil type be calculated as the sum of the total fuel consumption by fuel oil type per consumer?

No, the total consumption must continue to be measured using one of the established methods for the total annual fuel oil consumption already described in SEEMP Part II.

10. Is the quantity of residue/sludge to be subtracted from the fuel oil consumed when the method for measuring fuel consumption per consumer type is flow meters?

If the flow meter is installed after the daily tank, it should not be necessary to correct this fuel oil measurement, as sludge will be removed from the fuel oil prior to the daily tank.

11. Is boil-off gas (BOG) required to be reported under the DCS?

The data relating to boil-off gas (BOG) consumed on board the ship for propulsion or operation (e.g. BOG used for propulsion, operational needs such as in a boiler, or burnt in a gas combustion unit (GCU) for cargo tank pressure control or other operational purposes) is required to be collected and reported as fuel.