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CIRCULAR SEEMP Part III – Company Audits.

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Notice to: Ship Owners/ Managers/ Operators / Surveyors

MARPOL Annex VI Regulation 26.3.3 requires the Ship Energy Efficiency Management Plan (SEEMP) Part III, which contains the information required to calculate the ship's operational carbon intensity (CII), to be subject to periodical company audits at least every three years.

Resolution MEPC.347(78) contains the "Guidelines for the Verification and Company Audits by the Administration of Part III of the Ship Energy Efficiency Management Plan (SEEMP)".

The verification and audit process for the SEEMP normally involves:

- initial verification;
- periodical verifications;
- additional verifications; and
- company audits.

Verification of implementation aspects of the SEEMP on board (monitoring, self-evaluation and improvements, etc.) may be combined with the ISM audits.

Verification can include, but not be limited to:

- verification of the CII calculation method and that there is a proper description of the method of reporting ship data to the Administration;
- assessment of the effectiveness of the measures, so that when implemented, the ship will, with reasonable assurance, achieve the required annual operational CII, including the goal as set per the SEEMP Guidelines; and
- robustness of the three-year implementation plan and, where applicable, the plan of corrective actions, including whether realistic timelines for implementation of actions have been included.

Points to Note:

Periodical Verification (MARPOL Annex VI Reg 5.4.6)

The Administration should perform a periodical verification to ensure the SEEMP complies with regulation 26.3.1 of MARPOL Annex VI every three years, and when any of the elements in regulation 26.3.1 are updated.

The Confirmation of Compliance is issued by the Administration on satisfactory assessment of the SEEMP Part III.

Additional Verifications (MARPOL Annex VI Reg 6.8)

Ships rated as D for three consecutive years, or rated as E, will be required to undergo an additional verification to ensure that a plan of corrective actions has been established per regulations 28.7 and 28.8.

The Statement of Compliance is issued by the Administration on satisfactory verification of the plan of corrective actions.

Company audits

The Administration performs periodical company audits to:

- verify that the SEEMP for which the Confirmation of Compliance has previously been issued complies with regulation 26.3.1 and, in the case of non-compliance, require remedial action;
- confirm that the ship is being operated per SEEMP Part III, regardless of its rating;
- verify the progress made in the (corrective) actions to be taken in the execution of the three-year implementation plan and the plan of corrective actions;
- verify self-assessment and improvement of actions taken; and
- verify the assignment of responsibilities related to the implementation and monitoring of measures.

Periodical company audits may include annual audits of the company (company audits) and verifications on board the ship (shipboard audits).

Additional shipboard verifications and company audits, if undertaken, should be no later than six months after the issuance of the Statement of Compliance.

Act now

Ship Owners/ Managers/ Operators are to review the contents of [Resolution MEPC.347\(78\)](#) and be guided accordingly.