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Shipping Guidance Notice – 145(a)
Amendments to MARPOL Annex VI, Regulation 27, Appendix IX
Red Ensign Group Unified Interpretation (REG-UI) 006 Amendment 01
(To be read in conjunction with SGN 145)

To: Owners, Operators, Master's, Certifying Authorities and Recognised Organisations

1. References

- Shipping Guidance Notice (SGN) 145 – Ballast Water Treatment Systems – Challenging Water Quality
- Red Ensign Group Unified Interpretation (REG-UI) 006 Amendment 01

2. Summary

The purpose of this SGN is to bring to the attention of Owners, Operators, Master's, Certifying Authorities and Recognised Organisations amendment 01 to REG-UI 006.

REG-UI 006 Amendment 01 supersedes the original version appended to SGN 145 and is to be taken into account in respect of the guidance contained within SGN 145 associated with the *Amendments to MARPOL Annex VI, Regulation 27, Appendix IX - Enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS)*.

REG-UI 006 Amendment 01 is appended to this SGN, and may be additionally obtained via; https://www.redensigngroup.org/publications/

Steve Gomez
Chief Surveyor

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All notices are available through www.gibraltarship.com

This Shipping Guidance Notice has been issued electronically and does not carry a signature or official stamp. A signed and stamped copy is available upon request.

Red Ensign Group

Unified Interpretation

REG-UI 006
Amendment 01

Enhanced Collection of Fuel Usage Data

Notice to all Recognized Organizations, Ship Managers, Masters and Marine Engineers.

This notice should be read with MEPC.385(81) and MEPC.1/Circ.913.

This REG-UI expires on 1 January 2026.

Summary

The purpose of this Unified Interpretation is to clarify expectations for REG Flag vessels on how they should participate in the enhanced Data Collection System (DCS) submissions and the due dates for the different activities.

1. Introduction/ Background

1.1 All Ships of 5000 GT and above, subject to the MARPOL Convention, should already be making annual submissions of DCS fuel data to IMO. To date ships have been submitting the original DCS data required by MEPC.293(71) and incorporated into MARPOL Annex VI, Appendix IX.

1.1.1 This data is reported each calendar year.

1.1.2 REG Administrations have authorized our RO's to verify the submission data.

1.1.3 The verifying RO does not need to be the RO of the vessel.

1.2 The original DCS data only recorded total fuel bunkered of each fuel type for the entire year. Due to discussions about issues related to the Carbon Intensity Index (CII), it has been agreed for the database to facilitate a more granular DCS submission (Enhanced DCS) which will record fuel consumed in each consumer (Main Engine, Auxiliary Engine) onboard. This is intended to provide reliable data to facilitate the ongoing discussions of modifications to the CII.

1.2.1 The Enhanced DCS is still intended to be reported annually.

2. Measuring and Management

2.1 The control document for the DCS system is the SEEMP (Ship Energy Efficiency Management Plan).

2.1.1 The SEEMP must incorporate procedures for collecting and recording the required data.

2.2 The simplest and most direct method to record and report the enhanced DCS is by fitting flow meters for each consumer. These meters would then be read each year and the difference calculated.
  2.2.1 Photographic evidence of flow meter readings may be used in support of the required data submission.
  2.2.2 The RO verifying the submission may be sent the evidence and the completed submission at the agreed time.

2.3 The IMO also allow for systems of calculation and estimation to be used as the basis for submission of the Enhanced DCS.
  2.3.1 REG Administrations do not recommend the use of such systems for recording the enhanced DCS given the potential for the data to be compromised by inconsistencies over the course of a year.
  2.3.2 If such a system is to be used, the SEEMP must incorporate clear and detailed instructions of the measurements and estimates to be used for the submission.
  2.3.3 In this case the data will need to be accumulated consistently throughout the year.

3. Implementation Timing

3.1 Gathering the enhanced DCS data is vital to allow informed discussions about what changes are needed to correct the perverse incentives of the CII.

3.2 Enhanced DCS will become mandatory for all ships on 1 August 2025.

3.3 Due to the nature of the DCS reporting system, it is only possible to make reports of a full calendar year at a time.
  3.3.1 By default, therefore, the first full year that will be reported as enhanced DCS will be calendar year 1 January 2026 to 31 December 2026, and will be submitted in January 2027.

3.4 IMO have requested Flag Administrations to announce if they will opt for ‘Early Adoption’.
  3.4.1 This would mean that all ships with that flag would be required to submit enhanced DCS data for calendar year 1 January 2025 to 31 December 2025 and be submitted in January 2026.

3.5 In order to participate in early adoption:
  3.5.1 Ships would ideally be fitted with flow meters for the individual fuel consumers.
  3.5.2 SEEMPs will need to be amended to include the procedures required for recording the data before 1 January 2025.

4. Guidance and REG Intentions

4.1 The REG have concluded that there is insufficient time to mandate all ships in the REG fleet to have in place the equipment and procedures required in time to comply with early adoption.
  4.1.1 Therefore, the REG group will not mandate early adoption of enhanced DCS.

4.2 In recognition of the importance of collecting the enhanced DCS as early as possible, to facilitate ongoing discussions, the REG have agreed to encourage ship managers to voluntarily begin early adoption in the case of ships provided with the necessary equipment and procedures allowing early adoption of enhanced DCS data as from 1 January 2025.

5. Actions

5.1 Ship Managers of ships that may be capable of recording enhanced DCS data as from 1 January 2025 should contact their RO at the earliest opportunity in order to arrange the approval of the SEEMP and submission of procedures required to facilitate voluntary early adoption.

5.1.1 RO's are requested to expedite such applications to allow the voluntary reporting of ships provided with appropriate arrangements.

5.2 Ship managers of ships that are not able to begin gathering enhanced DCS data in time for early implementation should begin preparations for the mandatory implementation date of 1 August 2025.

5.2.1 As from 1 August 2025 and prior to 1 January 2026, ships should have in place all required equipment for measuring or otherwise determining the fuel usage in each consumer.

5.2.2 As from 1 August 2025 and prior to 1 January 2026, the SEEMP should have been modified with all procedures required to complete the required measurements or alternative procedures.

5.2.3 Enhanced DCS data in all cases will be mandatory from 1 January 2026.

More Information

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