



IMO DATA COLLECTION SYSTEM (IMO DCS) – COLLECTION AND REPORTING OF SHIP FUEL OIL CONSUMPTION DATA AND ENHANCED GRANULARITY REPORTING REQUIREMENTS

Reference: SKN Maritime Circular MC 160 26, Dated 31 July 2026

To: All Shipowners, Ship Managers, Ship Operators, Masters and Recognized Organizations of St. Kitts & Nevis-flagged vessels

The St. Kitts and Nevis International Ship Registry (SKAN Reg) has issued Maritime Circular MC 160 26, consolidating the requirements relating to the collection, verification, reporting and submission of ship fuel oil consumption data under the IMO Ship Fuel Oil Consumption Database (IMO DCS), including the enhanced granularity reporting introduced by Resolution MEPC.385(81). This Technical Note summarises the principal points of the Circular for information.

1. Background

The IMO DCS was introduced by Resolution MEPC.278(70), amending MARPOL Annex VI, with mandatory data collection commencing from 1 January 2019 for ships of 5,000 GT and above engaged on international voyages. Resolution MEPC.385(81) later replaced Appendix IX and expanded the data set to include transport work and enhanced granularity, entering into force on 1 August 2025.

2. Applicability and SEEMP Part II

This Circular applies to all St. Kitts & Nevis-flagged ships of 5,000 gross tonnage and above on international voyages subject to regulation 27 of MARPOL Annex VI, and to Recognized Organizations authorised to review SEEMP Part II, verify annual data and submit data to the IMO DCS. Each ship's SEEMP Part II must be maintained and, where necessary, revised in accordance with applicable IMO guidelines before commencing data collection.

3. Reporting Responsibilities

Shipowners and operators must ensure complete and accurate fuel oil consumption data is collected, recorded and retained in accordance with the approved SEEMP Part II methodology, and must ensure continuity and transfer of IMO DCS records where there is a change of ownership, management or class. Recognized Organizations authorised for DCS-related functions must review SEEMP Part II, verify annual submissions, issue the relevant

NOTES:

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Confirmation/Statement of Compliance, and submit verified data to the IMO DCS on behalf of the Administration.

- Ships of 5,000 GT and above on international voyages must collect and report fuel oil consumption data annually under the IMO DCS.
- All data for the same calendar year must be reported at the same level of granularity - mixed application of old and amended Appendix IX formats is not permitted.

Requirement	Effective Date / Status
Ships of 5,000 GT and above on international voyages (regulation 27, MARPOL Annex VI)	Must collect and report annual fuel oil consumption data under the IMO DCS
SEEMP Part II	Must be maintained and revised as necessary before commencing data collection for the relevant methodology
Change of ownership, management, operator or class during a reporting year	Continuity, traceability and transfer of IMO DCS records must be ensured

4. Action Required

Shipowners, ship managers, ship operators, masters and Recognized Organizations should ensure SEEMP Part II is current and reflects the enhanced-granularity methodology, that annual fuel oil consumption data is collected and submitted only through the Administration or a duly authorised Recognized Organization, and that IMO DCS records are properly transferred in the event of a change of ownership, management or class. Confirmations and related correspondence should be sent to imodcs@skanregistry.com.

For clarification on any of the above, please reach out to:

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