



ST KITTS & NEVIS INTERNATIONALSHIP REGISTRY

MARITIME CIRCULAR - MC 160 26

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

1. Purpose

1.1 This Maritime Circular is issued to remind shipowners, ship managers, ship operators, masters, and Recognized Organizations of ships flying the flag of St. Kitts & Nevis of the applicable 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).

1.2 This Circular further serves to consolidate, in a single instrument, both:

- (a) the original amendments introducing the mandatory Data Collection System for fuel oil consumption of ships under MARPOL Annex VI, adopted by Resolution MEPC.278(70); and
- (b) the later amendments to Appendix IX of MARPOL Annex VI adopted by Resolution MEPC.385(81), which expanded the information to be collected and reported, including data on transport work and enhanced granularity of fuel oil consumption reporting.

1.3 This Circular also draws attention to the related requirement for each ship in scope to maintain and, where necessary, revise its Ship Energy Efficiency Management Plan (SEEMP) Part II in accordance with the applicable IMO guidelines before commencing data collection for the relevant reporting methodology.

2. Applicability

2.1 This Maritime Circular applies to all St. Kitts & Nevis flagged ships of 5,000 gross tonnage and above engaged on international voyages and subject to regulation 27 of MARPOL Annex VI.

2.2 This Circular also applies to all Recognized Organizations authorized by the Administration to review SEEMP Part II, verify reported annual data, issue the relevant confirmation or Statement of Compliance, and submit verified data to the IMO Ship Fuel Oil Consumption Database on behalf of the Administration, where so authorized.

2.3 Clarification

- (a) the original IMO DCS reporting regime adopted by Resolution MEPC.278(70) has been mandatory for ships in scope since the commencement of data collection from 1 January 2019;

(b) the amendments adopted by Resolution MEPC.385(81) entered into force on 1 August 2025 and expanded the data set to be reported under Appendix IX of MARPOL Annex VI.

3. Legal References and Framework

This Maritime Circular should be read in conjunction with:

- (a) The Merchant Shipping Act of St. Kitts & Nevis and any regulations giving effect to MARPOL Annex VI, as amended;
- (b) The International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 and the Protocol of 1997, as amended (MARPOL), relevant regulations of Annex VI and Appendix IX;
- (c) Resolution MEPC.278(70) – Amendments to MARPOL Annex VI introducing the Data Collection System for fuel oil consumption of ships;
- (d) Resolution MEPC.385(81) – Amendments to MARPOL Annex VI including the replacement of Appendix IX concerning accessibility of data and inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Oil Consumption Database;
- (e) Resolution MEPC.388(81) – Amendments to the 2022 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP);
- (f) Resolution MEPC.395(82) – 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP), which revoked the 2022 Guidelines;
- (g) MEPC.1/Circ.913 – Guidance on the application of the amendments to Appendix IX of MARPOL Annex VI on inclusion of data on transport work and enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS);
- (h) MEPC.1/Circ.914 – Revised sample format for the Confirmation of Compliance pursuant to regulation 5.4.5 of MARPOL Annex VI; and
- (i) Maritime Circular MC 134/24 – Voluntary Early Application of the Amendments to SEEMP Part II and Reporting of Revised Ship Fuel Oil Consumption Data, where applicable.

4. Definitions

For the purposes of this Circular:

4.1 Administration means the St. Kitts & Nevis International Ship Registry acting on behalf of the Government of St. Kitts & Nevis as the Flag Administration.

4.2 Appendix IX means Appendix IX to MARPOL Annex VI setting out the information to be submitted to the IMO Ship Fuel Oil Consumption Database under regulation 27.

4.3 DCS means the IMO Ship Fuel Oil Consumption Data Collection System established under MARPOL Annex VI for the collection and reporting of annual fuel oil consumption data and associated information for ships in scope.

4.4 Enhanced granularity means the expanded level of data collection and reporting introduced by Resolution MEPC.385(81), including fuel oil consumption by consumer type, fuel oil consumption while the ship is not under way, transport work, total onshore power supplied, and other additional Appendix IX data elements, as applicable.

4.5 GISIS means the IMO Global Integrated Shipping Information System through which the IMO Ship Fuel Oil Consumption Database is accessed and administered.

4.6 Recognized Organization (RO) means an organization authorized by the Administration to perform specified statutory functions in relation to SEEMP Part II review, annual data **verification**, issuance of confirmations or Statements of Compliance, and/or submission of verified data under the IMO DCS on behalf of the Administration.

4.7 SEEMP Part II means the ship-specific data collection plan forming part of the Ship Energy Efficiency Management Plan, describing the methodology used to collect the data required by regulation 27.1 of MARPOL Annex VI and the processes used to report that data to the Administration.

4.8 Ship in scope means a ship of 5,000 gross tonnage and above engaged on international voyages and subject to regulation 27 of MARPOL Annex VI.

4.9 Statement of Compliance means the document issued following verification that the annual fuel oil consumption data and associated information have been reported in accordance with MARPOL Annex VI.

4.10 Transport work means the annual sum of each voyage's transport work, generally calculated as distance sailed multiplied by cargo carried during the voyage, using the applicable metric for the relevant ship type in accordance with the IMO guidance and reporting format.

5. Instructions

5.1 Original IMO DCS requirements under MARPOL Annex VI and Resolution MEPC.278(70)

Shipowners, ship managers, ship operators, masters and Recognized Organizations are reminded that the IMO DCS was introduced by Resolution MEPC.278(70) as amendments to MARPOL Annex VI and became applicable from 1 March 2018, with mandatory collection of data commencing from 1 January 2019 for ships in scope.

5.1.2 Each ship in scope shall collect, for each calendar year or portion thereof, the data specified in Appendix IX to MARPOL Annex VI in accordance with the methodology included in its approved SEEMP Part II.

5.1.3 At the end of each calendar year, the ship shall aggregate the collected data and submit it to the Administration or to a Recognized Organization duly authorized by the Administration for verification in accordance with MARPOL Annex VI.

5.1.4 Upon satisfactory verification of the annual data, the Administration or the authorized Recognized Organization shall issue the relevant Statement of Compliance and the verified data shall subsequently be submitted to the IMO Ship Fuel Oil Consumption Database through GISIS within the applicable timeframe.

5.2 Responsibilities of shipowners, ship managers, operators and masters

5.2.1 The shipowner and/or operator shall ensure that complete and accurate fuel oil consumption data, together with all other data required under the IMO DCS, is collected, recorded, retained and made available for verification in accordance with the methodology contained in the approved SEEMP Part II.

5.2.2 The shipowner and/or operator shall establish and maintain appropriate onboard and company procedures, records and controls to support the collection, aggregation, retention and reporting of the required data for each reporting period.

5.2.3 Masters and relevant shipboard personnel shall ensure that the data required under the IMO DCS is recorded in accordance with the approved methodology and that supporting records are maintained so as to permit verification of the annual data submitted.

5.2.4 Where there is a change of ownership, management, operator or class during a reporting year, the shipowner and/or operator shall ensure continuity, traceability and availability of the data collected for the relevant period, including the transfer of all relevant IMO DCS records and supporting information to the gaining company and/or gaining Recognized Organization, as applicable.

5.2.5 The shipowner and/or operator shall not withhold, restrict or otherwise prevent the transfer of IMO DCS data, records or supporting information where such transfer is necessary to ensure continuity of compliance, verification and reporting under MARPOL Annex VI.

5.2.6 In cases where an owner and/or operator refuses to transfer the IMO DCS data, records or supporting information collected for the relevant reporting period to a new owner, and/or where the former or losing Recognized Organization fails to transfer the relevant data or information to the gaining Recognized Organization, the ship's Designated Person Ashore (DPA) and/or Company Superintendent shall notify the Administration without delay, providing the relevant particulars of the ship, the reporting period concerned, the nature of the data affected, and the circumstances of the refusal or non-transfer.

5.3 Responsibilities of Recognized Organizations

5.3.1 Any Recognized Organization authorized by the Administration to perform DCS-related statutory functions shall:

- review and verify SEEMP Part II, as applicable;
- verify annual DCS submissions for completeness, consistency and conformity with the approved methodology;
- issue the relevant Confirmation of Compliance and/or Statement of Compliance where duly authorized;
- submit verified data to the IMO Ship Fuel Oil Consumption Database on behalf of the Administration where so delegated;
- promptly notify the Administration of any deficiencies, omissions, discrepancies, access issues or other matters affecting compliance with the IMO DCS requirements.

5.3.2 Whenever a ship subject to the IMO DCS transfers class from one Recognized Organization to another, the outgoing RO and the gaining RO shall cooperate to ensure the timely and complete transfer of all relevant information relating to the ship's IMO DCS reporting status for the applicable reporting year.

5.3.3 Such information shall include, as applicable, the status of data collection, aggregated data already compiled, supporting records made available to the RO, the status of verification, any outstanding corrections, and any relevant correspondence with the Administration or the IMO DCS Help Desk.

5.3.4 The outgoing RO shall provide, and the gaining RO shall request where necessary, sufficient information and records to ensure continuity of compliance, verification and reporting under MARPOL Annex VI and to avoid omissions, duplication or inconsistencies in the ship's IMO DCS records.

5.3.5 Where the transfer occurs during a reporting year, the gaining RO shall verify, to the extent practicable, that the ship's reporting obligations for that year remain properly assigned and reflected in the IMO DCS module.

5.3.6 In cases where the shipowner or operator refuses to authorize or provide the transfer of IMO DCS data, records or supporting information necessary to ensure continuity of compliance following a transfer of ownership, management or class, the gaining RO shall notify the Administration without delay and shall keep a documented record of the refusal and of the actions taken.

5.3.7 Likewise, where the former or losing RO does not provide the relevant IMO DCS data or related information to the gaining RO following a reasonable request, the gaining RO shall promptly inform the Administration and shall take all practicable steps to re-establish the ship's reporting status and maintain compliance for the remainder of the reporting period.

5.3.8 In all cases involving incomplete transfer of information, refusal to share data, or interruption in the chain of reporting, the relevant RO shall document the circumstances, the limitations encountered, the communications made, and the potential effect on the completeness or verification of the ship's IMO DCS records, and shall submit such information to the Administration upon request or where the matter may affect statutory compliance.

5.3.9 For the purposes of submission of IMO DCS data on behalf of the Administration, the following organizations are presently reflected in the IMO GISIS Ship Fuel Oil Consumption module as authorized recognized organizations for Saint Kitts and Nevis:

- American Bureau of Shipping (ABS)
- Bureau Veritas (BV)
- Capital Register of Shipping (CRSCLASS)
- China Classification Society (CCS)
- Croatian Register of Shipping (CRS)
- DNV AS (DNV)
- Dromon Bureau of Shipping (DBS)
- Eastern Marine Service Co., Ltd. (EMS)
- Emirates Classification Society TASNEEF (TASNEEF)
- Indian Register of Shipping (IRS)
- International Naval Surveys Bureau (INSB)

- International Register of Shipping (IS)
- Isthmus Bureau of Shipping, S.A. (IBS)
- Korean Register (KR)
- Lloyd's Register (LR)
- Nippon Kaiji Kyokai (ClassNK)
- Normec Verifavia SAS (VFS)
- Phoenix Register of Shipping S.A. (PHRS)
- Polski Rejestr Statkow (Polish Register of Shipping) (PRS)
- QUALITAS REGISTER OF SHIPPING S.A. (QRS)
- RINA Services S.p.A. (RINA)
- Swiss Climate Eco Care GmbH (SCE)
- Turk Loydu (TL)
- Veritas Register of Shipping (VRS)

5.3.10 Shipowners, managers and operators shall ensure that annual IMO DCS data is submitted only through the Administration or through a Recognized Organization duly authorized by the Administration for that purpose. The Administration may amend, restrict or update the list of authorized organizations at any time, and the latest status should be verified against the IMO GISIS module or by direct confirmation from the Administration.

5.4 Minimum data to be reported under the original IMO DCS regime

5.4.1 Under the original framework introduced by Resolution MEPC.278(70), the annual data set required under Appendix IX includes, at a minimum:

- ship identity and period of calendar year covered;
- technical characteristics of the ship, including ship type, gross tonnage, net tonnage, deadweight tonnage, rated power of main and auxiliary engines, attained EEDI, if applicable, and ice class, if applicable;
- total annual fuel oil consumption by fuel oil type and method of collection;
- total distance travelled; and
- hours under way.

5.5 SEEMP Part II requirements under the original regime

5.5.1 For each ship in scope, the Administration shall ensure, prior to the commencement of data collection, that the ship's SEEMP complies with regulation 26.2 of MARPOL Annex VI and includes the methodology and processes for data collection and reporting.

5.5.2 Shipowners and managers shall arrange for the timely submission or revision of SEEMP Part II to the Administration or the duly authorized Recognized Organization, as applicable, and the relevant Confirmation of Compliance issued pursuant to regulation 5.4.5 of MARPOL Annex VI shall be retained on board the ship.

5.6 Expanded reporting requirements under Resolution MEPC.385(81)

5.6.1 Resolution MEPC.385(81) replaced Appendix IX of MARPOL Annex VI and expanded the information to be submitted to the IMO Ship Fuel Oil Consumption Database.

5.6.2 In addition to the original annual data items, the amended Appendix IX now includes, as applicable:

- total fuel oil consumption by fuel oil type per consumer type;
- fuel oil consumption while the ship is not under way, by fuel oil type per consumer type;
- total amount of onshore power supplied;
- total transport work for ships to which regulation 28 applies;
- attained EEXI, where applicable;
- laden distance travelled, on a voluntary basis;
- applicable CII metric, required and attained annual operational CII values, operational carbon intensity rating, and related entries for ships to which regulation 28 applies; and
- installation of innovative technology and certain trial-purpose CII metrics on a voluntary basis.

5.6.3 Shipowners, managers, operators, masters, and authorized Recognized Organizations shall ensure that the methodology described in SEEMP Part II adequately addresses the additional data elements and the appropriate method of collection, aggregation and reporting.

5.7 SEEMP Part II revision for the expanded regime

5.7.1 Where the amended Appendix IX data set under Resolution MEPC.385(81) applies, the ship's SEEMP Part II shall be revised and verified before the start of the relevant reporting period using the enhanced-granularity methodology.

5.7.2 Shipowners and managers shall arrange for the timely revision and submission of SEEMP Part II to the Administration or the duly authorized Recognized Organization, and the relevant Confirmation of Compliance shall be retained on board the ship.

5.8 Uniformity of reporting year and early implementation

5.8.1 In accordance with MEPC.1/Circ.913, all data for the same calendar year shall be collected and reported at the same level of granularity. Mixed application of the old and amended Appendix IX reporting formats within the same calendar year is not permitted.

5.8.2 Where the amended framework is applied from the normal entry-into-force path, ships shall maintain a consistent level of data granularity for the whole relevant reporting year in accordance with the applicable IMO guidance.

5.9 Compliance expectation

5.9.1 Failure to maintain a compliant SEEMP Part II, failure to collect and report the required annual data, failure to apply the correct level of granularity, submission of incomplete or inconsistent data, or failure to preserve and transfer relevant IMO DCS records where required, may result in refusal or delay in verification and non-issuance of the relevant Statement of Compliance. In such cases, the Recognized Organization (RO) may take such further administrative action as deemed appropriate under the applicable statutory and certification framework, including actions that may impact the issuance, endorsement, or validity of relevant MARPOL Annex VI certificates, and those cases must be reported to the Flag Administration accordingly.

5.9.2 Shipowners, operators, managers, masters, and Recognized Organizations are expected to ensure full and timely compliance with this Circular and with all applicable IMO DCS reporting obligations.

6. Further Assistance and Information

6.1 All confirmations and related correspondence should be sent to the St. Kitts & Nevis International Ship Registry through the Compliance Department, to imodcs@skanregistry.com, with any IMO DCS system-related correspondence involving IMO support copied to the Administration.

6.2 Shipowners, ship managers, ship operators, masters and Recognized Organizations are expected to ensure full compliance with the requirements of this Maritime Circular and with the applicable provisions of MARPOL Annex VI relating to the IMO Ship Fuel Oil Consumption Database (IMO DCS).

6.3 Any questions concerning the application of this Circular, the revision of SEEMP Part II, the collection and reporting methodology, the verification of annual data, or the submission of data to the IMO Ship Fuel Oil Consumption Database may be addressed to the St. Kitts & Nevis International Ship Registry.

7. Validity and Supersession

7.1 This Maritime Circular shall enter into force on **August 15th, 2026**, and shall remain valid until amended, withdrawn, or superseded by a subsequent Maritime Circular, notice, instruction, or other formal direction issued by the Administration.

7.2 This Maritime Circular is intended to consolidate the Administration's guidance on the original IMO DCS reporting regime introduced under Resolution MEPC.278(70) and the expanded reporting requirements arising from Resolution MEPC.385(81), including associated SEEMP Part II considerations.

7.3 To the extent that any previous communication issued by the Administration addresses only the voluntary early application of the amended Appendix IX framework, including MC 134/24, this Circular shall be read as the broader and controlling guidance instrument on IMO DCS data collection and reporting for ships flying the flag of St. Kitts & Nevis.

7.4 The issuance of this Maritime Circular does not relieve any shipowner, ship manager, ship operator, master, or Recognized Organization from complying with any applicable convention requirement, statutory obligation, or specific direction issued by the Administration in relation to an individual ship or case.

8. Control of MC Changes

Document Version	Date	Details of Change
00	31/07/2026	Initial issue