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**LIBERIA MARITIME AUTHORITY**

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**17 November 2021**

**Marine Advisory: 14/2021**

**Subject: Amendments to MARPOL Annex VI – EEXI, CII and SEEMP**

**Dear Shipowners/Operators/Recognized Organizations/Verifiers**

The purpose of this Marine Advisory is to inform that as part of the short-term measures in the Initial IMO Strategy on Reduction of GHG Emissions from Ships (Resolution MEPC.304(72)), IMO adopted resolution MEPC.328(76) at MEPC 76 in June 2021, which enters into force on 1 November 2022 and introduces amendments to MARPOL Annex VI with new requirements for:

- Energy Efficiency Existing Ship Index (EEXI) (Regulation 23 & 25)
- Operational Carbon Intensity Indicator (CII) and CII rating (Regulation 28)
- Enhanced SEEMP (Regulation 28)

Pending issuance of a Marine Operations Note with detailed guidance, this document provides the intention of this Administration in respect to the delegation of responsibility to our Recognized Organizations (ROs) and Non-Classification Society Verifiers for providing the verification and certification services for the new EEXI, CII and Enhanced SEEMP requirements.

The EEXI requirement is a technical measure for existing vessels and an EEXI survey is required as part of the verification process; and therefore, the EEXI verification services will be delegated to the Classification Society for the vessel<sup>1</sup>. It should be noted the EEXI survey shall take place at the first annual, intermediate or renewal survey, whichever is first, on or after 1 January 2023.

The Operational CII requirement is an extension to the IMO DCS where we have authorized our 12 ROs and a few independent Non-Classification Society Verifiers (reference (b)) to undertake the fuel oil consumption (FOC) data verification with the requirement that the verified FOC data is sent to this Administration for final review and approval prior to the Administration reporting the FOC data to IMO and issuance of the annual statement of compliance (SOC).

The Administration will therefore extend this concept to include the CII verification and CII rating, and delegate the verification services to be undertaken by any of the authorized Verifiers listed in Appendix 1 of reference (b) irrespective of the Classification Society for the vessel. The annual SOC including the CII rating will be issued by the Administration.

The revised MARPOL Annex VI Regulations 5.4.6 and 26.3 requires that for vessels, where the CII requirement is applicable, should have their SEEMP enhanced no later than 1 January 2023 to include:

- the methodology that will be used to calculate the ship's attained annual operational CII and the processes that will be used to report this value to the ship's Administration

<sup>1</sup> Shipowners/Operators that may wish to use another RO for their fleet should contact this Administration to discuss and agree on the possible consequences and solutions.

- the required annual operational CII, as specified in regulation 28 of this Annex, for the next three years
- an implementation plan documenting how the required annual operational CII will be achieved during the next three years
- a procedure for self-evaluation and improvement

The intention of this Administration is for the enhanced SEEMP (SEEMP Part III) to be submitted to the IMO DCS and CII Verifier for verification and upon successful verification, the Administration will issue the Confirmation of Compliance for SEEMP Part III using the same process as for the COC for SEEMP Part II (reference (b)).

However, since the IMO “2022 GUIDELINES FOR THE VERIFICATION AND COMPANY AUDITS BY THE ADMINISTRATION OF THE SHIP ENERGY EFFICIENCY MANAGEMENT PLAN (SEEMP)” have not yet been finalized and are expected to be adopted at MEPC 78 tentatively scheduled for June 2022, the final process will be provided in our Marine Operations Note that will be prepared and issued as soon as possible.

For questions regarding this note please contact this Administration’s at email: [regsandstandards@liscr.com](mailto:regsandstandards@liscr.com) or via telephone number +1 703 790 3434.

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