



LATEST MARPOL ANNEX VI AMENDMENTS EEXI, CII & SEEMP

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As a first step to decarbonize shipping and considering IMO's GHG Strategy towards 2050, MEPC 75 adopted amendments to MARPOL Annex VI that are expected to have a significant impact to ship operations. These amendments require a dual approach to reducing shipping's carbon intensity, based on the following **technical** and **operational** measures:

Energy Efficiency Existing Ship Index (EEXI)

The implementation and enforcement of EEXI will broadly follow that of the Energy Efficiency Design Index (EEDI), including survey and certification.

All ships above 400 GT (regardless of age) will be required to calculate their Attained EEXI, based on ship type and size category. This Attained EEXI should be less than a specific Required EEXI, taken as a percentage relative to the EEDI baseline. This will be verified by each ship's Class, following review of the [EEXI Technical File](#) for each ship.

It is expected that most existing ships will meet the Required EEXI by installing **Engine Power Limitation (EPL)** or **Shaft Power Limitation (ShaPoLi)**. In such case, an [EPL / ShaPoLi Management Plan](#) will be required to be prepared and submitted to Class for approval.

All ships must meet the EEXI requirements by the first annual, intermediate or renewal survey after 1 Jan 2023.

Both the Attained and the Required EEXI will be included in each ship's International Energy Efficiency Certificate (IEEC).

Annual Operational Carbon Intensity Indicator (CII) & Rating

All ships above 5,000 GT will be required to calculate their Annual Operational **Attained CII**, based on verified data in accordance with the IMO Data Collection System (IMO DCS). Starting from 2023, the Attained CII will be compared to a **Required CII** which will be annually reduced by a specified percentage depending on ship type and size category. This comparison will determine the annual, ship-specific **Carbon Intensity Rating**, ranging from A (superior) to E (inferior). This rating will be included in each ship's IEEC.

The Attained CII calculation methodology and the Required CII for the first 3 years will be included in each Ship Energy Efficiency Management Plan (SEEMP). Subsequently, **each SEEMP for ships above 5,000 GT will have to be updated and re-approved by 1 Jan 2023**; the SEEMP will then be audited.

Any ship rated D for 3 consecutive years, or E for any one year, will be required to include a corrective action plan in the SEEMP, to demonstrate how improvement will be achieved.

It is also expected that industry stakeholders (Charterers, Port Authorities, etc.) will provide incentives to vessels rated A or B. Various measures may be taken towards improving a vessel's Carbon Intensity Rating, ranging from installation of Energy Saving Devices, application of low-friction hull coatings, etc.

Recommendations

As a first step, Owners/Operators of ships falling under the EEXI Regulation are urged to investigate **as early as possible** the impact of this requirement and how it can be met for each ship.

AMC has extensive experience in this field and may assist with the following:

- **Preparation of EEXI Technical File** (incl. determination of new Main Engine MCR in case of EPL application).
- **Preparation of EPL / ShaPoLi Management Plan.**
- **Preparation / update of SEEMP.**
Technical support and advice for installation of Energy Saving Devices.

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