

**Subject:** SEEMP Part III - Company and Shipboard Audits

**To:** Recognized Organizations, Shipowners, Companies and Operators

**Objective.**

The aim of this instruction is to provide guidance to the Recognized Organizations, Shipowners, Companies and Operators on procedures to be followed when company and shipboard audits of part III of the Ship Energy Efficiency Management Plan (SEEMP) are taken, according to the RESOLUTION MEPC.347(78), adopted on 10 June 2022.

**Application:**

SEEMP Part III provides an implementation plan on how the attained annual operational CII will be maintained less than or equal to the required annual operational CII for the next three years.

If any of the elements in regulation 26.3.1 is updated, and in any case every three years, the Administration should perform a periodical verification to ensure the SEEMP complies with regulation 26.3.1 of MARPOL Annex VI in accordance with regulation 5.4.6 of MARPOL Annex VI.

On satisfactory assessment of SEEMP part III, the Administration should issue the Confirmation of Compliance.

The verification of and the company audits related to the SEEMP may be carried out by the Administration or an organization recognized by it.

Verification of implementation aspects of the SEEMP on board (monitoring, self-evaluation and improvements, etc.) could be combined with the ISM audits.

According to RESOLUTION MEPC.347(78), 5.7, the Administration should, in the case of a ship rated as D for three consecutive years or a ship rated as E, perform an additional verification to ensure that a plan of corrective actions has been established in accordance with RESOLUTION MEPC.328(76) regulations 28.7 and 28.8.

The Administration should, in accordance with regulation 26.3.3, perform periodical company audits. The periodical company audits may include annual audits of the company (company audits) and verifications on board the ship (shipboard audits). These additional shipboard verifications and company audits, if undertaken, should be six months after the issuance of the Statement of Compliance at the latest

**Implementation:**

1. A periodical verification, to ensure the SEEMP complies with regulation 26.3.1 of MARPOL Annex VI in accordance with regulation 5.4.6 of MARPOL Annex VI, and a company audit, regardless of the rating received, should be carried at intervals not exceeding three (3) years;
2. An additional verification shall be carried to a ship rated as D for three consecutive years, to ensure that a plan of corrective actions has been established. A company audit should take place during the third year, after 2 consecutive years, rated as D, no later than 30 November;
3. An additional verification shall be carried to a ship rated as E, to ensure that a plan of corrective actions has been established. A company audit, in conjunction with a shipboard audit, should take place during the immediate year after, being rated as E, no later than 30 November;
4. Verification of implementation aspects of the SEEMP on board (monitoring, self-evaluation and improvements, etc.) may be combined with the ISM audits;
5. The Administration has decided to delegate the verification of and the company audits, related to the SEEMP, to recognized organizations;
6. The Administration has decided to extend the due date of the Company audits to 31 December 2025.

This instruction applies to all Portuguese flagged vessels.

Date: 25.02.2025