



**GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
DIRECTORATE GENERAL OF PORTS & SHIPPING WING**

MARINE GUIDANCE NOTE-- MGN- 003/2026

Karachi, dated the 05 June 2026

**Subject: ENHANCED COLLECTION AND REPORTING OF FUEL OIL CONSUMPTION DATA
UNDER MARPOL ANNEX VI (IMO DCS) — APPLICABLE FROM 1 JANUARY 2026**

References

- (a) MARPOL Annex VI, regulations 27 and 28 and appendix IX, as amended by resolution MEPC.385(81), in force 1 January 2025 with data collection at the enhanced level of granularity from 1 January 2026.
- (b) Resolution MEPC.395(82) — 2024 Guidelines for the development of a Ship Energy Efficiency Management Plan (SEEMP), as amended by resolution MEPC.401(83).
- (c) Resolution MEPC.346(78) — 2022 Guidelines for the development of a SEEMP, as superseded.
- (d) MEPC.1/Circ.905/Rev.1 — Clarification of entries in data reporting required by regulations 27 and 28 of MARPOL Annex VI (application date 1 January 2027).

1. Purpose

1.1 This Circular draws the attention of Companies operating Pakistan-flag ships to the enhanced fuel oil consumption data which must be collected for the calendar year commencing 1 January 2026 and reported to the Administration in 2027, and specifies the action to be taken.

2. Application

2.1 This Circular applies to Pakistan-flag ships of 5,000 gross tonnage and above engaged on international voyages, to which regulations 27 and 28 of MARPOL Annex VI apply.

3. The enhanced data set

- 3.1 With effect from the reporting year commencing 1 January 2026, the data collected and reported under the IMO Ship Fuel Oil Consumption Database shall include, in addition to the particulars previously required:
 - total fuel oil consumption disaggregated by each category of fuel-consuming equipment — that is, main engine or engines, auxiliary engines, fired boilers, and such other consumers as are fitted;
 - total fuel oil consumption while the ship is under way and, separately, while the ship is not under way;
 - hours under way; and
 - transport work and such cargo-related particulars as are applicable to the ship type.
- 3.2 The expressions “under way” and “not under way”, and the substitution of the term “fired boiler” for “boiler”, are to be construed in accordance with section 7 of the SEEMP Guidelines as amended by resolution MEPC.401(83). Companies are cautioned that inconsistent interpretation of these terms across a fleet is a common source of unreliable Carbon Intensity Indicator data.

- 3.3 The clarifications contained in MEPC.1/Circ.905/Rev.1 carry an application date of 1 January 2027, aligned with the commencement of the next data collection year, and are to be reflected in the SEEMP in good time before that date.

4. Action by Companies

- 4.1 The data collection methodology and reporting processes described in the ship's SEEMP (Part II) shall be revised to capture the enhanced data set, and the revised SEEMP shall be submitted to the Recognized Organization for confirmation of compliance. Companies which have not yet done so shall complete this action without delay and shall advise this Department of the position of each ship in the fleet.
- 4.2 Engine room recording arrangements shall be reviewed to ensure that consumption can be attributed reliably to individual consumers. Where flow meters are fitted, their calibration, redundancy and data logging arrangements shall be verified; where tank soundings and Bunker Delivery Notes remain the primary method, the method of apportionment between consumers shall be described in the SEEMP and applied consistently.
- 4.3 The Chief Engineer shall ensure that Engine Room Log Book, Oil Record Book and noon report entries are mutually consistent and reconcilable with the data submitted, and that the periods when the ship is not under way are recorded so as to permit the separation required by paragraph 3.1.
- 4.4 The aggregated data for the calendar year 2026 shall be reported to this Administration, or to the Recognized Organization duly authorized for the purpose, within three months of the end of that calendar year, that is by 31 March 2027. The Statement of Compliance relating to fuel oil consumption reporting shall thereafter be issued in accordance with regulation 6.6 of MARPOL Annex VI.
- 4.5 Where a ship is transferred from one flag to another, or a change of Company occurs, the reporting obligations of regulation 27 shall be discharged in respect of the part of the year concerned before transfer, and evidence retained on board.

5. Action by Recognized Organizations

- 5.1 Recognized Organizations shall not confirm compliance of a SEEMP which does not provide for collection of the enhanced data set, and shall report to this Department any Pakistan-flag ship which fails to submit data within the period specified in paragraph 4.4.

6. Enquiries

- 6.1 Enquiries arising from this Circular may be addressed to the Chief Engineer & Ship Surveyor, Directorate General Port and Shipping Wing (DGPS), Karachi.

(Syed Ali Tahir Nasir)
Chief Engineer & Ship Surveyor and
Chief Examiner of Engineers

Distribution

1. All Pakistan Flag Shipowners, Ship Managers and Operators.
2. All Recognized Organizations authorized by the Government of Pakistan.
3. Principal Officer, Mercantile Marine Department, Karachi.
4. All Departmental Surveyors and Port State Control Officers.
5. Director General Ports & Shipping (for information).
6. Office copy / MMD website.