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Shipping Guidance Notice – 145(b)
Amendments to MARPOL Annex VI, Regulation 27, Appendix IX
Red Ensign Group Unified Interpretation (REG-UI) 006 Amendment 02
(To be read in conjunction with SGN 145 & 145(a))

To: Owners, Operators, Master's, Certifying Authorities and Recognised Organisations

1. References

- Shipping Guidance Notice (SGN) 145 – Amendments to MARPOL Annex VI, Regulation 27, Appendix IX - Enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS)
- Red Ensign Group Unified Interpretation (REG-UI) 006 Amendment 02

2. Summary

The purpose of this SGN is to bring to the attention of Owners, Operators, Master's, Certifying Authorities and Recognised Organisations amendment 02 to REG-UI 006.

REG-UI 006 Amendment 02 supersedes amendment 01 and the original version appended to SGN 145 and is to be taken into account in respect of the guidance contained within SGN 145 & SGN 145(a) associated with the *Amendments to MARPOL Annex VI, Regulation 27, Appendix IX - Enhanced granularity in the IMO Ship Fuel Consumption Database (IMO DCS)*.

REG-UI 006 Amendment 02 is appended to this SGN, and may be additionally obtained via; https://www.redensigngroup.org/publications/

Steve Gomez - Chief Surveyor
For & on behalf of the Maritime Administrator

Issue date: 17 April 2026

All notices are available through www.gibraltarship.com

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Red Ensign Group

Unified Interpretation

REG-UI 006
Amendment 02

Enhanced Collection of Fuel Usage Data

Notice to all Recognized Organizations, Ship Managers, Masters and Marine Engineers.

This notice should be read with MEPC.385(81) and MEPC.1/Circ.913.

This REG-UI replaces previous versions and remains extant until amended or withdrawn.

Summary

The purpose of this Unified Interpretation is to clarify expectations for REG Flag vessels on how they should participate in the enhanced Data Collection System (DCS) submissions.

1. Introduction/ Background

1.1 For all ships of 5000 GT and above, subject to the MARPOL Convention, submission of enhanced DCS data as required by MEPC.385(81) and incorporated into MARPOL Annex VI, Appendix IX, became mandatory on 1st August 2025.

1.1.1 These data are to be reported each calendar year.

1.1.2 Red Ensign Group Administrations have authorized their Recognised Organisations to verify the submission data.

1.1.3 The verifying RO does not need to be the RO of the vessel.

1.2 Prior to 2025, these ships were making annual submissions of DCS fuel data to IMO as required by MEPC.293(71).

1.3 The original DCS data only recorded total fuel bunkered of each fuel type for the entire year. Due to discussions about issues related to the Carbon Intensity Index (CII), it was agreed for the database to facilitate a more granular DCS submission (Enhanced DCS) which records fuel consumed in each consumer onboard which includes but not limited to fuel oil consumed by the main engines, auxiliary engines, gas turbines, boilers and inert gas generator, for each type of fuel oil consumed, regardless of whether a ship is under way or not.

1.4 This is intended to provide reliable data to facilitate the ongoing discussions of modifications to the CII.

1.5 Early adoption - whereby ships recorded enhanced data from 1st January 2025 to 31st December 2025 and submitted data for the entire year in January 2026 - was encouraged but not mandated by the Red Ensign Group.

2. Measuring and Management

2.1 The control document for the DCS system is the SEEMP (Ship Energy Efficiency Management Plan).
- 2.1.1 The SEEMP must incorporate procedures for collecting and recording the required data.

2.2 The simplest and most direct method to record and report the enhanced DCS is by fitting flow meters for each consumer taking into account the guidance provided within MEPC.346(78), section 7.2

2.3 These meters would then be read each year and the difference calculated.
- 2.3.1 Photographic evidence of flow meter readings may be used in support of the required data submission.
- 2.3.2 The RO verifying the submission may be sent the evidence and the completed submission at the agreed time.
- 2.3.3 Flow meters should be maintained and calibrated in accordance with manufacturer recommendations.

2.4 The IMO also allow for systems of calculation and estimation to be used as the basis for submission of the Enhanced DCS.
- 2.4.1 REG Administrations do not recommend the use of such systems for recording the enhanced DCS given the potential for the data to be compromised by inconsistencies over the course of a year.
- 2.4.2 If such a system is to be used, the SEEMP must incorporate clear and detailed instructions of the measurements and estimates to be used for the submission.
- 2.4.3 In this case the data will need to be accumulated consistently throughout the year.

3. Actions

3.1 Ensure ships have in place all required equipment for measuring or otherwise determining the fuel usage in each consumer.
3.2 Ensure that for all ships, the SEEMP has been modified with all procedures required to complete the required measurements or alternative procedures.
3.3 Ensure all ships are recording Enhanced DCS data for submission in January 2027 and each year thereafter.

More Information

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