The Bahamas Maritime Authority

Version No. 1

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SEEMP Part III Company Audits and Onboard Verifications

1. Purpose

1.1. This Technical Alert provides guidance on the Bahamas Maritime Authority (BMA) requirements for periodical Company audits and on-board verifications relating to Part III of the Ship Energy Efficiency Management Plan (SEEMP Part III), as required by regulation 26.3.3 of Annex VI of the International Convention for the Prevention of Pollution from Ships, 1973, as amended (MARPOL Annex VI).

2. Application

2.1. This Technical Alert applies to all ships of 5000 gross tonnage and above to which Chapter 4 of MARPOL Annex VI applies.

3. References

3.1. This Technical Alert should be read in conjunction with regulations 6, 26, 27 and 28 of MARPOL Annex VI, IMO resolution MEPC.347(78), *Guidelines for the verification and company audits by the Administration of Part III of the Ship Energy Efficiency Management Plan (SEEMP)*[1], and BMA Marine Notice 63.

4. SEEMP Part III verification requirements

4.1. From 01 January 2026, periodical on-board verifications and Company[2] audits relating to SEEMP Part III shall be conducted in accordance with regulation 26.3.3 of MARPOL Annex VI, taking into account the guidelines adopted by IMO resolution MEPC.347(78).

4.2. A periodical Company SEEMP Part III audit shall be completed at intervals not exceeding three years.

[1] https://mf.bahamasmaritime.net/SharedLinks.aspx?accesskey=366040cb933366d7ad05aeeaed68580e50959e5d62f58bab2b9f77a2ef4abebf&VaultGUID=8A7ABFCE-CCD2-49D8-9190-B5F8650E5B38

[2] The 'Company' is the entity responsible for the operation and management of the ship in accordance with the ISM Code (SOLAS Chapter IX), as applied under the Merchant Shipping Act, 2021. Where the ISM Code is not applicable, the Company is the entity recorded as responsible for the operation of the ship in accordance with regulation 5(3)(d) of the Merchant Shipping (Registration) Regulations, 2026.

4.3. Periodical on-board verification of SEEMP Part III shall be carried out at intervals not exceeding three years.

4.4. An Additional on-board SEEMP Part III Verification shall be carried out when any of the elements required by regulation 26.3.1 of MARPOL Annex VI have been updated, including the introduction of corrective measures where a ship is rated D for three consecutive years or rated E.

5. Company SEEMP Part III audit

5.1. A periodical Company SEEMP Part III audit shall be completed at intervals not exceeding three years and, where practicable, should be aligned with a scheduled external ISM DOC verification, whether annual or renewal. The audit should normally be undertaken by the Recognised Organisation issuing the Company DOC, even where that Recognised Organisation does not class any Bahamian ships operated by the Company.

5.2. For Companies operating ships that are not subject to the ISM Code, the interval between periodical Company SEEMP Part III audits shall not exceed 36 months. The audit shall be completed by a Bahamas Recognised Organisation that classes one or more ships in the Company's fleet.

5.3. Where the Company DOC has been issued by an entity other than the BMA or a Bahamas Recognised Organisation, the periodical Company SEEMP Part III audit shall be completed by a Bahamas Recognised Organisation that issues the IAPP Certificate to one or more ships in the Company's fleet. In such cases, the periodical Company SEEMP Part III audit may be completed separately from the DOC audit, provided the interval between Company SEEMP Part III audits does not exceed three years.

5.4. The results of the periodical Company SEEMP Part III audit shall be communicated directly to the BMA by the Recognised Organisation, separately from the DOC audit report.

5.5. Where a periodical Company SEEMP Part III audit is completed as part of a Company DOC audit, deficiencies or non-compliances identified during the SEEMP Part III audit shall not be considered DOC audit non-conformities unless they directly affect the Company's safety management system.

5.6. The periodical Company SEEMP Part III audit shall address the elements specified in paragraph 5.9 of IMO resolution MEPC.347(78). Subject to those minimum elements, the BMA leaves the detailed scope, depth and extent of the audit to the professional judgement of the Recognised Organisation conducting the audit.

5.7. Where a Bahamian ship is rated D for three consecutive years or rated E, the BMA may require an additional Company SEEMP Part III audit. The Recognised Organisation shall obtain BMA authorisation before undertaking the audit. The BMA may provide case-specific instructions.

5.8. The BMA may, on occasion, undertake a Company SEEMP Part III audit directly and separately from the arrangements specified in paragraph 5.1. In such cases, the BMA will provide advance notification to the Company.

6. Company SEEMP Part III audit timing and alignment with ISM verifications

6.1. For the purpose of implementing the periodical Company SEEMP Part III audit requirement under regulation 26.3.3 of MARPOL Annex VI, the BMA will apply a three-year audit cycle commencing on 01 January 2026.

6.2. Paragraph 7.1 of IMO resolution MEPC.347(78) provides that verification of implementation aspects of SEEMP Part III on board may be combined with ISM audits. As an administrative arrangement, the BMA also permits periodical Company SEEMP Part III audits to be aligned with scheduled Company DOC verifications.

6.3. The first periodical Company SEEMP Part III audit should be completed once the Company has operated one or more Bahamian ships of 5000 gross tonnage or above to which Chapter 4 of MARPOL Annex VI applies for at least three years[3].

7. On-board SEEMP Part III verifications

7.1. Initial, periodical and additional SEEMP Part III verifications referred to in paragraphs 5.3 to 5.8 of IMO resolution MEPC.347(78) shall be completed by the Bahamas Recognised Organisation that classes the ship.

7.2. Initial on-board SEEMP Part III verification shall be completed in accordance with paragraph 5.3 of IMO resolution MEPC.347(78). For a new ship, verification shall be completed before the ship is put into service. Upon satisfactory verification, a Confirmation of Compliance shall be issued in accordance with the format contained in the annex to IMO resolution MEPC.347(78).

7.3. Periodical on-board SEEMP Part III verification shall be aligned with an IAPP Certificate intermediate or renewal survey.

[3] A three-year period means a period sufficient for the Company to receive three annual CII ratings for one or more Bahamian ships in its fleet

7.4. An additional verification shall be undertaken when any of the elements of the SEEMP Part III have been updated.

7.5. Where an additional on-board SEEMP Part III verification is required for a ship rated D for three consecutive years or rated E, the Recognised Organisation shall obtain BMA authorisation prior to attendance. The additional verification shall be completed as part of an additional IAPP survey, and the BMA may provide additional case-specific guidance. The scope of the additional verification shall include verification that a plan of corrective actions has been developed in accordance with regulations 28.7 and 28.8 of MARPOL Annex VI. The additional verification should be completed promptly after the ship receives an operational carbon intensity rating of D for the third consecutive year or a rating of E and, in any case, no later than 30 November of the same year. Upon satisfactory verification of the plan of corrective actions, a Statement of Compliance shall be issued in accordance with regulation 6.8 of MARPOL Annex VI.

7.6. Upon satisfactory completion of an Additional Verification, a new Confirmation of Compliance shall be issued in accordance with the format contained in the annex to IMO resolution MEPC.347(78).

7.7. The BMA does not currently mandate the additional shipboard verifications referred to in paragraph 5.11 of IMO resolution MEPC.347(78).

8. Company SEEMP Part III self-assessment

8.1. To reduce the administrative burden associated with periodical Company SEEMP Part III audits, the BMA may, on a case-by-case basis, accept a Company self-assessment as an alternative means of demonstrating compliance with the BMA's periodical Company audit arrangements, subject to prior BMA authorisation and the following conditions:

i. the Company has operated one or more Bahamian ships to which Chapter 4 of MARPOL Annex VI applies for a period of not less than three years;
ii. at the time of application, no Bahamian ship in the Company's fleet has been rated D for three consecutive years or rated E;
iii. no Bahamian ship in the Company's fleet has outstanding PSC deficiencies relating to Chapter 4 of MARPOL Annex VI or outstanding statutory conditions imposed on its IAPP Certificate in relation to energy-efficiency requirements; and
iv. the Company provides the BMA with details of the personnel assigned responsibility for implementing energy-efficiency measures and monitoring their effectiveness across the fleet.

8.2. Where authorised by the BMA, the Company SEEMP Part III self-assessment shall be completed within the timeframe specified in the BMA authorisation.

8.3. Upon completion of the self-assessment, the Company shall submit a written report to the BMA, the entity issuing the Company DOC and each Recognised Organisation issuing IAPP Certificates to Bahamian ships in the Company's fleet. The report shall describe the self-assessment undertaken, any findings identified and any corrective actions taken or proposed and shall, as a minimum, address all elements specified in paragraph 5.9 of IMO resolution MEPC.347(78).

8.4. Where the self-assessment identifies deficiencies in the implementation of SEEMP Part III, the deficiencies shall be identified in the self-assessment report submitted to the BMA. The BMA may require an additional external Company SEEMP Part III audit or other verification to address such deficiencies, as appropriate.

9. Queries

9.1. Any queries on this Technical Alert may be submitted to tech@bahamasmaritime.com or any BMA office.

10. Validity

10.1. This Technical Alert is valid until 31 December 2026 or until the next revision of Marine Notice 63, whichever occurs first.