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FLEET SAFETY LETTER 191121.GEN –
19th November 2021

Applicable to: This FLEET SAFETY LETTER should be brought to the attention of ship-owners, ship managers, operators, Masters of Vanuatu-registered ships and Recognized Organizations

Statements of Compliance: IMO vide Resolution, MEPC. 324 (75) adopted following amendments to MARPOL Annex VI, which will enter into force on 1 April 2022.

A. Following new definitions are included under Regulation 2:

- “Sulphur content of fuel oil” means the concentration of Sulphur in a fuel oil, measured in % m/m as tested in accordance with standard acceptable to the Organization.
- Low-flashpoint fuel means gaseous or liquid fuel oil having a flashpoint lower than otherwise permitted under paragraph 2.1.1 of regulation 4 of chapter II-2 of the International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended.
- MARPOL delivered sample means the sample of fuel oil delivered in accordance with regulation 18.8.1 of this Annex.
- “In-use sample” means a sample of fuel oil in use on a ship; and “On board sample” means a sample of fuel oil intended to be used or carried for use on board that ship.

B. Fuel oil sampling and verification:

- 1.) The amendment introduced two new fuel oil samples for confirming compliance with MARPOL Annex VI Sulphur requirements and the carriage ban for fuel oil with a Sulphur content exceeding 0.50%, namely the “in-use” sample drawn from the fuel oil system representing the fuel in use, and the “on-board” sample representing fuel intended to be used and carried in the fuel oil storage tanks.
- 2.) Further the amendment requires one or more sampling points to be fitted or designated for the purpose of taking representative samples of the fuel oil being used or carried for use on board the ship.
- 3.) The above requirement is applicable to new ships (keel laid on or after 1 April 2022). Existing ships will need to comply with the above requirement not later than the first IAPP renewal survey on or after 1 April 2023.
- 4.) The fitting or designating of sampling point/s is not applicable to a fuel oil system for low-flashpoint fuels (flashpoint <60°C).

5.) Supplement to the International Air Pollution Prevention (IAPP) certificate is also amended to add a reference to sampling points and also to note where there is an exemption to the provision for low-flashpoint fuel:

C. Appendix VI:

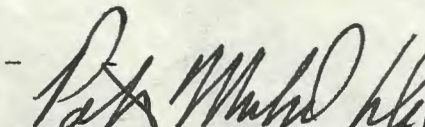
Appendix VI on the Fuel verification procedure for MARPOL Annex VI fuel oil samples was also revised to cover verification of the representative samples of "in-use fuel oil" and "on board fuel oil". A new Part 2 is added to Appendix VI of MARPOL Annex VI giving the verification procedure for the new "in-use" and "on-board" samples. To avoid ships being unjustly fined for marginal excess in Sulphur content beyond their control, as opposed to the verification procedure in Part 1 for the MARPOL-delivered sample taken during bunkering, a 95% confidential interval has been given. This implies that a Sulphur content of up to 0.53% may be accepted as compliant when testing the "in-use" and "on-board" samples.

D. Ship Owners:

Ship Owners / managers and masters are advised to be guided by above and accordingly plan for the fitting or designating of sampling points as required by revised MARPOL Annex VI, Reg. 14.

While the preferred solution may be to designate already existing sampling points, fitting and designating new sampling points may in some cases be the only option. For such cases, the arrangements for fitting and designating new sampling points will need to be reviewed and approved.

All ROs may be contacted for necessary guidance in this regard.


Patrick Michael DeCHARLES

by the direction of the
Deputy Commissioner of Maritime Affairs
The Republic of Vanuatu

