

Fuel Oil Sampling Points

Amended Rules and Guidance

Rules for Marine Pollution Prevention Systems

Guidance for Marine Pollution Prevention Systems

Reason for Amendment

Regulation 14 of MARPOL Annex VI specifies upper limits for the sulphur concentration of fuel oils used by ships for the purpose of preventing air pollution caused by sulphur oxides emitted from ships. In addition, Regulation 18 of the same annex specifies that bunker delivery notes listing the sulphur content levels of the fuels being used as well as samples of said fuels are to be maintained on board ships. ClassNK has already incorporated such requirements into its Rules.

After the aforementioned regulations came into effect, however, there was also a discussion at the IMO on the fuel oil sampling for ships entering the port. As a result of these discussion, an amendment of MALPOL Annex VI which requires the installation or designation of sample points for representative samples of fuel oil used on board was adopted as IMO resolution MEPC.324(75) at the 75th session of the IMO Marine Environment Protection Committee (MEPC 75) held in November 2020. In addition, as related provisions of the relevant resolution, the guideline MEPC.1/Circ.864(Rev.1) which stipulates specific points for sample collection was approved at MEPC 74 held in May 2020.

Accordingly, all relevant requirements were amended based upon the related resolution and the MEPC circular.

Outline of Amendment

The main contents of this amendment are as follows:

- (1) Specified the requirements for installation or designation points to collect representative samples of fuel oil to be used.
- (2) Specified that details on sample collection referred to the guidelines provided for in MEPC.1/Circ.864(Rev.1).
- (3) Specified that low flashpoint fuels used for ship propulsion were not subject to representative sample collection.
- (4) Specified the survey requirements for registration surveys and periodical surveys.

“Rules for marine pollution prevention systems” has been partly amended as follows:

Part 2 SURVEYS

Chapter 2 REGISTRATION SURVEYS

2.1 Registration Surveys during Construction

2.1.3 Inspections of Construction and Equipment*

Sub-paragraph -5(6) has been amended as follows.

5 Inspections are to be carried out on the following items for the equipment for the prevention of air pollution from every ship of 400 *tons* gross tonnage or above, every mobile offshore drilling unit and other platforms. However, the inspections required in (2)(b) ~~and~~ (3) excluding (a) and (6) are to be carried out irrespective of tonnage of the ship.

((1) to (5) are omitted.)

(6) Representative sample (in-use samples) position of fuel oil to be used

Confirmation that positions for representative sample (in-use samples) of fuel oil are fitted or designated.

Chapter 3 REGISTRATION MAINTENANCE SURVEYS

3.1 Annual Surveys

3.1.2 Inspections of Construction and Equipment*

Sub-paragraph -4 has been amended as follows.

4 Inspections are to be carried out on the following items for the equipment for the prevention of air pollution from every ship of 400 *gross tonnage* and above, every mobile offshore drilling unit and other platforms. The surveys referred to in (3)(b) and (7) ~~is~~ are, however, to be carried out on all ships.

((1) to (6) are omitted.)

(7) Representative sample (in-use samples) position of fuel oil to be used

Confirmation that positions for representative sample (in-use samples) of fuel oil are fitted or designated.

3.2 Intermediate Surveys

3.2.2 Inspections of Construction and Equipment*

Sub-paragraph -4 has been amended as follows.

4 Inspections specified in 3.1.2-4 are to be carried out on the equipment for the prevention of air pollution from every ship of 400 *gross tonnage* and above, every mobile offshore drilling unit and other platforms except where all ships are to be subjected to the surveys referred to in 3.1.2-4(3)(b) and (7).

3.3 Special Surveys

3.3.2 Inspections of Construction and Equipment*

Sub-paragraph -5 has been amended as follows.

5 Inspections specified in 3.2.2-4 are to be carried out on the equipment for the prevention of air pollution from every ship of 400 *gross tonnage* and above, every mobile offshore drilling unit and other platforms except where all ships are to be subjected to the surveys referred to in 3.1.2-4(3)(b) and (7).

Part 8 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

Chapter 1 GENERAL

1.1 General

1.1.2 Terminology (*Regulation 2, 13, 14 and 16 of Annex VI and 1.3, 4.1, 4.3.9 and 4.4.8 of NOx Technical Code*)*

For the purpose of the requirements in this Part, the following definitions apply unless specified otherwise in Chapters 2 or 3:

Sub-paragraphs (25) and (26) have been added as follows.

((1) to (24) are omitted.)

(25) “Low-flashpoint fuel” means the gaseous or liquid fuel specified in **2.2.1-28, Part GF**.

(26) “In-use sample” means a sample of fuel oil in use on a ship.

Chapter 2 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

Section 2.2 has been amended as follows.

2.2 Sulphur Oxides (SOx) and Particulate Matter (*Regulation 14 of Annex VI*)

2.2.1 Fuel Oil Change-over on Ship Operating in SOx Emission Control Areas (~~*Regulation 14 of Annex VI*~~)

(-1 and -2 are omitted.)

2.2.2 In-use fuel oil sampling points*

1 For ships (including mobile offshore drilling units and other platforms) which are at the beginning stage of their construction on or after 1 April 2022 and which are deemed necessary by the Society, sampling points are to be fitted or designated for the purpose of taking representative samples (in-use samples) of the fuel oil being used on board the ship, taking into account guidelines deemed appropriate by the Society.

2 For ships (including mobile offshore drilling unit and other platforms) which are at the beginning stage of their construction before 1 April 2022 and which are deemed necessary by the Society, the sampling points specified in -1 above are to be fitted or designated no later than the first Special Survey carried out on or after 1 April 2023.

3 The requirements specified in -1 and -2 above are not applicable to fuel oil service systems for low-flashpoint fuels for combustion purposes for propulsion or operation on board the ship.

“Guidance for marine pollution prevention systems” has been partly amended as follows:

Part 2 SURVEYS

Chapter 1 GENERAL

1.1 General

1.1.3 Intervals of Surveys

Sub-paragraph -2(9) has been added as follows.

2 Occasional surveys specified in **1.1.3-5(3), Part 2 of the Rules** are to be in accordance with the followings:

(9) Sampling points for representative sample (in-use samples) of fuel oil

For ships subject to **2.2.2, Part 8 of the Rules** and which were at the beginning stage of their construction on or before 1 April 2022, a survey is to be carried out to verify compliance with the fitting or designating of sampling points specified in **2.2.2-1, Part 8 of the Rules** by the first Special Survey carried out on or after 1 April 2023.

Part 8 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

Chapter 2 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

Section 2.2 has been amended as follows.

2.2 Sulphur Oxides (SO_x) and Particulate Matter *(Regulation 14 of Annex VI)*

2.2.1 Fuel Oil Change-over on Ship Operating in SO_x Emission Control Areas *(Regulation 14 of Annex VI)*

(-1 and -2 are omitted.)

2.2.2 In-use fuel oil sampling points

1 The wording “deemed necessary by the Society” in **2.2.2-1 and -2, Part 8 of the Rules** means all ships deemed necessary by the Administration.

2 The wording “guidelines deemed appropriate by the Society” in **2.2.2-1, Part 8 of the Rules** means the “*2019 Guidelines for On Board Sampling for the Verification of the Sulphur Content of the Fuel Oil Used On Board Ships (MEPC.1/Circ.864/Rev.1, as amended)*”.