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 emissions. In addition, the installation or designation of sample points for representative samples of fuel oil used on board is also specified, and ClassNK has already incorporated such requirements into its Rules.

Since an IACS member subsequently pointed out that the target ships subject to requirements for the sample points of representative samples of fuel oil used on board were unclear, IACS decided to submit a draft unified interpretation which clarified matters to the 9th session of IMO Sub-committee for Pollution Prevention and Response (PPR 9) for approval. After discussing the IACS's proposal, the PPR sub-committee, however, decided against approving the IACS draft because the majority of committee members felt that it was already clear the target ships of the requirements were those ships of 400 gross tonnage and above that are engaged in international voyages, and thus further clarification was not needed.

Accordingly, relevant requirements were amended based on the result of discussion at PPR 9.

Outline of Amendment

Amended the target ships subject to requirements for the sample points of representative samples of fuel oil used on board to specify that such ships (including mobile offshore drilling units and other platforms) are those of 400 gross tonnage and above that are engaged in international voyages.

"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 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 $(2)(b)_{\overline{7}}$ 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 <u>(limited to ships of 400 gross tonnage and above that are engaged in international voyages)</u>
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 $(3)(b) = \frac{1}{and} (7) = \frac{1}{areis}$, 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 <u>(limited to ships of 400 gross tonnage and above that are engaged in international voyages)</u>
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 survey^s referred to in 3.1.2-4(3)(b) and (7).

Part 8 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

Chapter 2 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

2.2 Sulphur Oxides (SOx) and Particulate Matter (*Regulation14 of Annex VI*)

Paragraph 2.2.2 has been amended as follows.

2.2.2 In-use fuel oil sampling points*

1 For ships (including mobile offshore drilling units and other platforms) which of 400 gross tonnage and above engaged in international voyages that 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 units and other platforms) which of 400 gross tonnage and above engaged in international voyages that 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 8 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

Chapter 2 EQUIPMENT FOR THE PREVENTION OF AIR POLLUTION FROM SHIPS

2.2 Sulphur Oxides (SOx) and Particulate Matter (*Regulation14 of Annex* VI)

Paragraph 2.2.2 has been amended as follows.

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)".