



DEPARTMENT OF ECONOMIC DEVELOPMENT

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### **Fuel Sampling, Testing and Reporting for Sulphur Content**

The purpose of this notice is to advise shipowners, operators, managers and Masters of Isle of Man registered ships of information in regard to forthcoming Port State Control and Sulphur Inspection activities.

The Isle of Man Ship Registry gives advance notice of the forthcoming implementation by the European Union (EU) Member States within the Paris MoU, of sulphur inspections which will be performed in conjunction with port state control inspections

#### **General Information & Application:-**

From the 1<sup>st</sup> January 2015, MARPOL Annex VI required all ships within an Emission Control Area (ECA) to burn fuel with a maximum sulphur content of 0.1%, or less.

EU Directive 2012/33/EU requires all ships "at berth" in EU Community ports to burn fuel with a maximum sulphur content of 0.1%, or less.

EU Directive 1999/32/EC, as amended by 2005/33/EC and 2012/33/EU, which relates to sulphur content of liquid fuels, also requires that fuel samples are taken from ships and tested for sulphur content.

The European Commission Implementing Decision (ID) 2015/253 of the 16<sup>th</sup> February 2015 lays down rules for Member States concerning the sampling and reporting under the Directive.

Therefore from **1<sup>st</sup> January 2016 it will become mandatory** for EU Member States when carrying out port state control inspections, to carry out checks of ship's log books to confirm time date and place of changeover to low sulphur fuel (entering an ECA and/or at berth), and to check that the ship has a written changeover procedure, and further check Bunker Delivery Notes (BDN). Additionally one of both of the following means of sampling and analysis for compliance with sulphur standards will be carried out;

- Analysis of the sealed bunker samples on board ships accompanying the BDN which have been taken in accordance with Regulation 18.8.1., and 18.8.2., of Annex VI to MARPOL.
- On board spot sampling, either single or multiple sampling of the marine fuels for on-board combustion, from a location where a valve is fitted for the purpose of drawing sample in the fuel service system, as indicated on the ship's fuel piping systems or arrangement plan.

The sample is to be taken by a responsible ship's representative and handed to the inspector who will label and date sample and also give a sample to the ship's representative in case of dispute after testing. The sample retained by the ship's representative should be kept on board for a period of not less than 12 months from the date of collection.

It would be advisable for the ship to be prepared for these inspections and having all relevant information to hand and be able to show the Inspector the "chain" from the bunkering of low sulphur fuel to being used by the consumer via settling/service tanks etc... It would also be useful to see where a "spot" sample could be safely taken as close to the consumer as possible.

Many shipowners will already be aware that, Denmark, Germany and the Netherlands have been sampling and testing for a number of years. However, it has been brought to our attention that Sweden has recently started sulphur inspections and is apparently charging the shipowner a fee for testing the sample.

**Maximum fuel sulphur content (by mass - % m/m\*) established by the Directive**

	<b>outside</b> EU SECAs**	<b>inside</b> EU SECAs**	Exceptions
Ships at berth in EU ports (includes at anchor)	<b>0.10%</b> Not if timetable < 2 hrs or engines switch off and shore-side electricity		Ships using Approved Emission Abatement Methods****
Passenger ships on regular services to/from EU ports	Until 01-01-2020 1.5% From 01-01-2020 <b>0.50%</b>		
Other ships/cases	From 18-06-2014 <b>3.50%</b> *** From 01-01-2020 <b>0.50%</b> **		

Shipowners, operators, managers and Masters of Isle of Man registered ships should note that these requirements will take effect, not only in SECA areas, but within all EU ports. Therefore those ports bounding areas outside the normal SECA areas will enforce the established Directive.

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