Isle of Man Ship Registry Technical Advisory Notice



MARPOL Designated Sampling Points

Ref. 005-21 Issued 14/10/21

Introduction

To facilitate the regulations under MARPOL Annex VI relating to the global 0.50% cap on fuel oil sulphur content, a further requirement has been introduced by Resolution MEPC.324(75).

The requirement mandates the designation of on-board sampling points for collection of MARPOL 'in-use' fuel oil samples. It will enter into force on 1 April 2022.

Application

The new regulation affects all vessels of 400 gross tonnage and above that require an IAPP certificate under MARPOL Annex VI. The timeline to comply with the regulation is:

- Existing ships where the keel was laid before 1 April 2022 will be required to designate sampling points no later than the first IAPP renewal survey on or after 1 April 2023
- New ships where the keel is laid on or after 1 April 2022 will require sampling points to be designated and in place upon delivery

Sampling points are required for all fuel oil systems servicing primary and auxiliary systems.

Fuel oil service systems for low flashpoint fuels having a flashpoint less than 60°C are the only permitted exemption.

MARPOL Sampling Points

MARPOL sampling points must be physically marked and clearly identified on the relevant piping diagram for the system. The easiest solution to meet the requirement will be to designate existing sampling points as MARPOL sampling points. Where not possible, vessels are required to fit new sampling points. The following guidelines should be considered:

- 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)
- 2020 Guidelines for on Board Sampling of Fuel Oil Intended to be Used or Carried for Use on Board a Ship (MEPC.1/Circ.889)

Survey

All surveys, approvals and certificates required for MARPOL Annex VI are currently delegated to the Recognised Organisations given in MSN 020.

Further Information

 MEPC.324(75) - Amendments to MARPOL Annex VI (Procedures for Sampling and Verification of the Sulphur Content of Fuel Oil and the EEDI)

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

