**Marine Fuel Sulphur Record Book**

**For the control of Sulphur Oxide Emissions**

73/78 MARPOL Annex VI Reg. 14 & 18

& the Annex of Resolution MEPC.182(59)

Regulations for the Prevention of air Pollution from Ships

Ship Name ……………………………………………………………………….……………

IMO No ………………………………………………………………………………………..

Date log commenced …………………………………………………………………………

Owner name……………………………………………………………………………………

Location of IMO Marpol VI Samples…………………………………… …………………

Location of Bunker Delivery Note (BDN) …………………………………………………

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**1. Introduction**

This MARPOL 73/78 Annex VI Reg.14 & 18 record book allows ships to simply demonstrate their and the supplier’s level of compliance with this regulation and at the same time maintain a system to track the statutory sample, sample custody transfer, BDN and any notes of protest issued.

This log-book does not supersede any flag administration requirements for the maintenance of Annex VI Reg.14 & 18 records on board ships.

**2. Regulatory requirements overview.**

**a. Supplier is to comply with:**

• Reg. 18 (5), which states that the Supplier is to provide a compliant Bunker Delivery Note (BDN)

• Reg. 18 (8), which states that the Supplier is to provide a representative sample of the fuel oil delivered. This sample is to be used solely for determination of compliance with Annex VI MARPOL 73/78 by port state authorities.

• Resolution MEPC182(59) Guidelines for the sampling of the fuel oil, which requires that the IMO sample should be taken at the receiving ship’s bunker inlet manifold according to specified procedures.

• Reg. 18 (3), which requires the fuel to be of a specified quality.

**b. Ship’s Master is to comply with:**

• Reg. 14 (1) , which states that the sulphur content of any fuel used on board shall not exceed 0.5% m/m.

• Reg.14 (4), which requires ships to demonstrate that whilst the ship is passing through an Emission control area (ECA) it is using fuel which has a sulphur content not exceeding 0.1 % m/m

• Reg. 14 (6) for those ships using separate fuels to comply with Reg.14 (4) as follows:

* carry a written procedure showing how the fuel oil change-over is to be done, allowing sufficient time for the fuel oil service system to be fully flushed of all fuel oils exceeding the applicable sulphur content specified in paragraph 4 of this regulation prior to entry into an ECA (SMS form OP191 “LSFO Change Over Calculator” can be used to calculate the sufficient time required)
* record the completion of any fuel-changeover procedure when entering and leaving an ECA to verify compliance. The records shall include the volume of the low sulphur fuel in each tank, the date, time and position of the ship when the fuel change over is complete before entering the ECA or after the exit of such an area

• Reg. 18 (6), which states that the ship is to retain the BDN, readily available for inspection, on board the ship for a minimum of 3 years.

• Reg. 18 (8), which states that the IMO sample is to be retained under the ship’s control until the fuel is substantially consumed, but in any case for a period of not less than 12 months from the time of delivery.

• Resolution MEPC.182 (59), which requires that the:

* ship’s master should develop and maintain a system to keep track of the retained samples
* the retained sample should be kept in a safe sheltered storage location, outside the ship’s accommodation, where personnel would not be exposed to vapours which may be released from the sample and where it will not be subject to elevated temperature or direct sunlight, preferably at a cool/ambient temperature

**3. The Log Sheets**

The record book contains four log sheets with accompanying check lists they are:

a. Log 1 – Bunker Details: Covering the key bunkers details linking the independent analysis report to the bunker operation.

b. Log 2- BDN and Annex VI Sample records: This notes the compliance record of the Bunker Delivery Note (BDN) and the Annex VI Statutory representative sample. It also logs details of any Letters of Protest (LOP) issued and the disposal dates of the Annex VI sample and the BDN.

c. Log 3- Custody transfer log: This provides a mechanism by which the ship can track the movements of the bunker statutory sample.

d. Log 4 – Fuel change over log for ships entering and leaving an ECA.

Note: Log 1 & 2 will need to be completed for each separate bunker. Log 3 & 4 to be completed when applicable.

**4. BDN and Statutory sample compliance check lists**

In Log No.2 you are required to identify whether the BDN and Statutory samples are fully compliant with the requirements of Annex VI Reg. 18.

See Appendix 1 for the two main check lists 7(a) & 7(b).

**5. Letter of Protest (LOP)**

In event that either the BDN or the statutory sample, or both, have been found to be non-compliant, a LOP should be issued in accordance with the ship’s standing instructions. We recommend that the ship’s flag administration is consulted as to whether they have any procedural requirements for LOP’s.

However if no standing instructions exist then it is recommended that three copies of the LOP may be issued. One to the supplier, one to the port state authority over seeing the registration of the suppliers and a final LOP for the ship’s records.

Issuing of the LOP will demonstrate the ship’s understanding of Annex VI requirements putting the onus on the supplier in the event that a port state authority challenges any non-compliance identified.

See Appendix 2 for an example of an LOP for the purposes of these regulations. This may be used in the event that the ship does not already have a standing instruction from its owner.

**6. Ship’s Strategy in compliance to Annex VI Reg.14**

For ease of crew reference it is recommended that the ship operates on of the following strategies whilst navigating in a MARPOL VI ECA.

|  |
| --- |
| Option 1 – All fuel carried on board is distillate fuel oil less than 0.1 %m/m Sulphur Content |
|  |
| Option 2 – Dual Fuel operations: distillate fuel oil < 0.1% & HFO <0.5% – Change over procedures will apply. |
|  |
|  |
| Option 3 – Equivalent standard for compliance with Reg 14 ECA requirements  *(Allow 3-5 lines for comments)* |
|  |
| Option 4 – Strategy for handling other emission regulations, such as those imposed by the EU and USA (ie California). – please specify. |

**7. Appendix 1 Check lists to verify Supplier’s compliance to the BDN and Annex VI fuel sample. In case of “No” below a Letter of Protest is to be issued**

**a. The BDN Must include the following details**

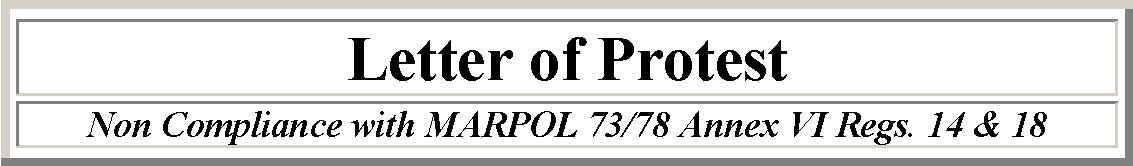
|  |  |  |
| --- | --- | --- |
|  | **Record** | **Compliant y/n** |
| 1 | Name and IMO number of receiving ship |  |
| 2 | Port of bunkering |  |
| 3 | Date of commencement of delivery |  |
| 4 | Name, address, and telephone number of marine fuel oil supplier |  |
| 5 | Product name(s) |  |
| 6 | Quantity (metric tons) of bunkers delivered |  |
| 7 | Density at 15deg.C (kg/m3) |  |
| 8 | Sulphur content (%m/m) (actual figure) |  |
| 9 | A declaration signed and certified by the fuel oil supplier’s representative that the fuel oil supplied is in conformity with regulation 14(1) or 14 (4) and regulation 18(3) of Annex VI. |  |

**b. The BDN must be accompanied by a MSDS for the fuel bunkered**

|  |  |  |
| --- | --- | --- |
|  | **Record** | **Compliant y/n** |
| 1 | Fuel MSDS |  |

**c. The Annex VI fuel sample can only be considered in compliance if the following have been confirmed. (MEPC.182.59)**

|  |  |  |
| --- | --- | --- |
|  | **Record** | **Compliant y/n** |
| 1 | Sampling point was the receiving ship’s inlet bunker manifold |  |
| 2 | Sample was drawn from an approved sampling device |  |
| 3 | A means was provided to seal the sampling equipment through out the supply. |  |
| 4 | Primary sample receiving container was sealed & attached to the sampling equipment |  |
| 5 | Sample was not tampered with during bunkering |  |
| 6 | Sample was drawn by continuous drip through out the bunker delivery period |  |
| 7 | Sample collected is not less than 400ml |  |
| 8 | Label with specified information is securely attached. Label to include: • Date of commencement of delivery • Name and IMO No. of receiving ship • Location at which the sample was drawn • Name of bunker tanker/bunker installation • Names and signatures of supplier’s and ship’s representatives. • Details of seal identification. • Bunker Grade |  |
| 9. | Tamper-proof security seal with unique identification is installed by supplier in the presence of the ship’s representative immediately following the collection |  |
| 10. | Annex VI Sample Seal details recorded on the BDN – *(Note all samples drawn, signed and witnessed at the inlet manifold should have their seal details recorded on the BDN)* |  |



|  |  |
| --- | --- |
| **Port:** |  |
| **Date:** |  |
| **Receiving Vessel Name :** | **IMO #** |
|  |  |
| **Delivery Vessel/Installation:** | **IMO #** |
| **BDN Reference Number:** |  |
| **Annex VI Sample Ref. No.** |  |

**To Supplier:**

**Copied to Port State Authority:**

On behalf of my principal(s), I <*Name and Rank*> hereby register the following item(s) which may be regarded as being non compliant with reference to MARPOL 73/78 Annex VI 14 & 18.

**Further details as necessary will be advised if requested.**

|  |  |
| --- | --- |
| <Signature & Supplier’s Stamp> | <Signature & Ship’s Stamp> |

