

Palau International Ship Registry



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MARINE CIRCULAR 196.1

To: ALL SHIPOWNERS, MANAGERS, MASTERS, AND REGNONIZED ORGANIZATIONS.

Subject: MARPOL DESIGNATED SAMPLING POINTS

1. Reference

- 1.1 The International Convention for the Prevention of Pollution from Ships (MARPOL)
- 1.2 Resolution MEPC.324(75) (*Procedures for sampling and verification of the sulphur content of fuel oil and the Energy Efficiency Design Index (EEDI)*)

2. Purpose

- 2.1 This Marine Circular informs Recognized Organizations and Deputy Registrars about the MARPOL amendments adopted by the International Maritime Organization (IMO) concerning the procedures for sampling and verification of the Sulphur content of fuel oil and the Energy Efficiency Design Index (EEDI)

3. Applicability

- 3.1 This Marine Circular applies to all vessels 400 GT and above that require an IAPP certificate under MARPOL Annex VI.

4. Additional Information

- 4.1 Resolution MEPC.324(75) provides further requirements in order to facilitate the Regulations under MARPOL Annex VI relating to the global 0.50% cap on fuel oil Sulphur content. The requirement mandates the designation of on-board sampling points for collection of MARPOL "in-use" fuel oil samples.

- 4.2 Following the new amendments there are now three defined fuel oil samples under MARPOL, each provided with a set of IMO guidelines:

4.2.1 MARPOL delivered sample1 – this is the traditional sample taken during bunkering, accompanying the Bunker Delivery Note (BDN) and which represents the fuel oil delivered on board.

4.2.2. In-use sample2 – this is a new sample meant to represent the fuel oil in use at the time and for which sampling points shall be designated.



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4.2.3. On board sample3 – this is a new sample meant to represent the fuel in the fuel oil tanks, i.e. fuel oil intended to be used or carried for use.

4.3 The timeline to comply with the regulation is:

4.3.1 Existing ships where the keel was laid before April 1st, 2022 will be required to designate sampling points no later than the first IAPP renewal survey on or after April 1st, 2023

4.3.2 New ships where the keel is laid on or after April 1st, 2022 will require sampling points to be designated and in place upon delivery.

4.4 Sampling points are required for all fuel oil systems servicing primary and auxiliary systems where fuel oil service systems for low flashpoint fuels having a flashpoint less than 60°C are the only permitted exemption.

4.5 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. When not possible, vessels are required to fit new sampling points and the following guidelines should be considered:

4.5.1 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)

4.5.2 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)

5. Entry into Force

5.1 The amendments are expected to enter into force on April 1st, 2022

6. Surveys

6.1 All surveys, approvals, and certificates required for MARPOL Annex VI are to be carried out and issued by Recognized Organizations duly authorized by the Palau Flag Ship Registry Administrator.

6.2 Applications can be submitted by owners, managers, Deputy Registrars and Recognized Organizations for the review and issuance of the exemption.



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7. Contact

- 7.1 Any inquiries concerning the subject for this Marine Circular should be directed to the Palau Ship Registry Administrator at technical@palaureg.com

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