

Isle of Man Ship Registry Technical Advisory Notice



Independent Lab Testing for Sulphur Content of Bunkers

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The Ship Registry is receiving an increasing number of reports from operators regarding the delivery of apparent 'off-spec' fuel which may exceed the MARPOL Annex VI maximum sulphur content of 0.1% m/m or 0.5% m/m. This notice does not apply to fuel which may be 'off spec' due to other issues such as a flash point below 60°C.

Such issues are most commonly detected by operators opting to have bunker supplies independently tested in order to detect off-spec fuel at the earliest opportunity. It should be noted that this is a commercial decision for the operator and there is no legal requirement for independent testing.

Where this is done, the Ship Registry considers that the Bunker Delivery Note remains the definitive legal document as to the sulphur content of the fuel oil. Accordingly, where fuel oil is delivered with a BDN indicating compliance with the 0.1% m/m or the 0.5% m/m limits, but independent laboratory testing indicates that fuel oil exceeds either limit, the Ship Registry will permit use of this fuel at the discretion of the operator.

An operator may also wish to notify the appropriate authorities in the state where the suspected off-spec fuel was supplied.

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.

