

26 February 2016

Service update: Announcement of voluntary fuel oil sampling program by USCG

Applicability: Ship owners and operators

The United States Coast Guard (USCG) recently issued a marine safety information bulletin outlining a voluntary fuel oil sampling program to assess the compliance with MARPOL Annex VI ECA-SOx requirement of 0.10% m/m sulphur for ships calling U.S. ports. Click [here](#) to view the bulletin online.

In summary, the ships visiting U.S. ports may be requested by the port State control officers for fuel system sampling from 29 February, 2016. Key points about the new program include the following:

- Sampling is voluntary – the Coast Guard will ask ship masters for permission to sample
- Ships that provide voluntary samples will not receive sanctions if the voluntary samples are non-compliant, and
- All samples will be taken at appropriate locations by the ship's crew with Coast Guard oversight.

It would appear the intention of this program is to collect useful data for administrations of the coastal states to gauge industry compliance. Whether or not the intention is to develop a verification framework for USCG similar to EU implementation act, is yet to be established.

At this time, the sampling measures being introduced are voluntary. Still, it may be prudent to ensure safe custody of the bunker delivery note (BDN), MARPOL Annex VI sample and the records of fuel change over, as these may still be called for by USCG for compliance verification. Moreover, it is for the ships benefit to install and/or identify appropriate dedicated sampling connections in the fuel oil service system, so that truly representative spot samples of the fuel oil being used can be readily obtained.

If you need further clarification or have any comments or questions, please contact us at fobas@lr.org