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FOBAS Bulletin: Introduction of fuel sulphur compliance verification process by Transport Canada

Applicability: All ship owners and operators

Recently, Transport Canada (TC) announced a process where Marine Safety Inspectors have started verifying the compliance with the 0.10% m/m sulphur fuels through on-site fuel sampling and analysis. The bulletin from TC can be accessed by the following link;

<http://www.tc.gc.ca/media/documents/marinesafety/SSB-08-2016E.pdf>

We understand TC inspectors are using portable fuel analysers to get instant results from on-board fuel system samples however for further evaluation, these samples are also sent to an accredited lab for ISO standard sulphur test to confirm and compare the results from portable analyser.

It is unclear what level of penalties (if any) will be applied in case of non-compliance however it is stated that the results will help inspectors to make informed decisions on any future course of action.

Hence, apart from ensuring to identify and install appropriate dedicated sampling connections in the fuel oil service system to assist the inspectors, it is also 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 TC for compliance verification.

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