



IMO updates fuel oil sampling guidelines

The 'MARPOL delivered sample' size has increased from 400ml to 600ml and must now also be available for checking the flashpoint requirements under SOLAS Regulation II-2/4.2.1.

Published 31 October 2024

The information provided in this article is intended for general information only. While every effort has been made to ensure the accuracy of the information at the time of publication, no warranty or representation is made regarding its completeness or timeliness. The content in this article does not constitute professional advice, and any reliance on such information is strictly at your own risk. Gard AS, including its affiliated companies, agents and employees, shall not be held liable for any loss, expense, or damage of any kind whatsoever arising from reliance on the information provided, irrespective of whether it is sourced from Gard AS, its shareholders, correspondents, or other contributors.

Safety of ships relating to the use of fuel oil

The minimum 60 degrees Celsius (°C) flashpoint limit in SOLAS Regulation II-2/4.2.1.1 is not new, but the regulations designed to prevent the supply of oil fuel in breach of this limit are. In November 2022, the IMO MSC 106 adopted [amendments to SOLAS](#) requiring bunker suppliers to provide ships with a declaration prior to bunkering, stating that the flashpoint of the actual oil fuel batch is in conformity with the flashpoint requirements of SOLAS. They also clarify that the required information “*may be included in the Bunker Delivery Note (BDN) according to MARPOL Annex VI/18*”. These SOLAS amendments will enter into force on 1 January 2026.

Information to be included in the BDN

Even though the SOLAS amendments have yet to take effect, the new flashpoint documentation requirements for suppliers became effective on 1 May 2024 in an [amendment to MARPOL Annex VI](#). Hence, Appendix V of MARPOL Annex VI already requires the BDN to include information about the fuel oil's flashpoint, which can be either the flashpoint value measured in °C or a general statement confirming that flashpoint has been measured at or above 70°C.

New sampling guidelines

To support the regulatory changes, and to account for situations in which oil fuel with a flashpoint of less than 60°C has been delivered, the IMO has published a circular, [MSC-MEPC.2/Circ.18](#), updating its fuel oil sampling guidelines. The new circular revokes the previous [MEPC Resolution 182\(59\)](#), the 2009 Guidelines for the safe taking of the 'MARPOL delivered sample', and extend the use of this sample to include testing of the SOLAS flashpoint requirements.

While the main objectives of the new guidelines and their basic requirements on sampling locations, arrangements, and procedures for taking, labelling and storing the sample, have not changed, it is important to be aware of the following changes:

- **Sampling methods**

: Section 4 explicitly requires personnel responsible for primary sampling and preparing the samples for storage to be familiar with equipment and guidelines. Also, representatives of both the ship and supplier should witness the sampling operation.

- **Sampling and sampling integrity**

: Section 5 warns against using low-flashpoint solvents to clean samplers and containers prior to use, as this can contaminate samples.

The information provided in this article is intended for general information only. While every effort has been made to ensure the accuracy of the information at the time of publication, no warranty or representation is made regarding its completeness or timeliness. The content in this article does not constitute professional advice, and any reliance on such information is strictly at your own risk. Gard AS, including its affiliated companies, agents and employees, shall not be held liable for any loss, expense, or damage of any kind whatsoever arising from reliance on the information provided, irrespective of whether it is sourced from Gard AS, its shareholders, correspondents, or other contributors.

- **Retained sample handling**

: Section 7 requires a minimum sample size of 600ml, up from 400ml previously.

- **Retained sample storage**

: Section 9 transfers responsibility for tracking retained samples from the ship's Master to the Company.

- **Procedures and documentation following testing of retained sample:**

New Section 10 describes the procedures and documentation requirements for situations requiring a fuel oil's flashpoint to be checked. The sulphur verification procedures detailed in Appendix VI of MARPOL Annex VI remain unchanged.

Furthermore, keep in mind that the retained 'MARPOL delivered sample' should only be used to test for compliance with the convention requirements and not to resolve commercial quality disputes.

Additional sources of information

- [Fitting of fuel oil sampling points becomes mandatory](#)
- [Bunker supply contracts – key considerations for the buyer](#)
- [Are you 95% confident that your very low sulphur fuel is on spec and MARPOL compliant?](#)
- [Prepare crews for PSC spot sampling of ships' fuel](#)

The information provided in this article is intended for general information only. While every effort has been made to ensure the accuracy of the information at the time of publication, no warranty or representation is made regarding its completeness or timeliness. The content in this article does not constitute professional advice, and any reliance on such information is strictly at your own risk. Gard AS, including its affiliated companies, agents and employees, shall not be held liable for any loss, expense, or damage of any kind whatsoever arising from reliance on the information provided, irrespective of whether it is sourced from Gard AS, its shareholders, correspondents, or other contributors.