



## **Gard Alert: Vessel manoeuvring affected by the use of ultra-low sulphur fuel**

The US Coast Guard recommends that vessel owners and operators evaluate if the use of ultra-low sulphur fuel necessitate any amendments to the pilot card.

Published 23 February 2016

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According to the US Coast Guard's [Marine Safety Alert 13-15](#) of 19 November 2015, several vessels have reported that main engines have not been able to attain the expected speed after switching to ultra-low sulphur (ULS) fuel to comply with MARPOL Annex VI emission regulations. The Coast Guard therefore recommends vessel owners and operators involved in fuel change-over operations to:

- discuss the vessel's manoeuvring characteristics, including any change in RPMs associated with ULS fuel oil, as part of the master-pilot information exchange (as required by 33 CFR 164.11(k)); and
- determine if using ULS fuel necessitates any amendments to the pilot card (see IMO Resolution A.601(15) and US Coast Guard Navigation and Vessel Inspection Circular (NVIC) No.7-89).

The Coast Guard has also previously voiced concerns over fuel change-over operations. In March 2015 they reported that an increasing number of vessels were experiencing loss of propulsion when performing fuel change-over operations and provided a list of recommendations to vessel owners and operators emphasising the importance of establishing effective fuel oil change-over procedures. The two recommendations listed above concerning vessel manoeuvrability have now been added to that list.

Meeting the new sulphur emission limits by changing to a compliant low sulphur fuel prior to entering one of the MARPOL ECAs requires planning and analysis. Members and clients are therefore advised to review all the recommendations published by the US Coast Guard and update their fuel change-over procedures if necessary. See below for a full list of the recommendations.

For additional information related to operations in US waters, see Gard Alerts “[US Coast Guard - low sulphur fuel issues](#)” of 4 March 2015 and “[US penalty policy for ECA violations](#)” of 22 January 2015. For general information on the operational effects of switching between high and low sulphur fuels and the potential risks involved, see Gard's Loss Prevention Circular No.06-14 “[Preparing for low sulphur operation](#)”.