



**PANAMA MARITIME AUTHORITY  
(AUTORIDAD MARÍTIMA DE PANAMÁ)  
GENERAL DIRECTORATE OF MERCHANT MARINE  
(DIRECCIÓN GENERAL DE MARINA MERCANTE)  
DEPARTMENT OF CONTROL AND COMPLIANCE  
(DEPARTAMENTO DE CONTROL Y CUMPLIMIENTO)**

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(DCCM)  
V.00



**MERCHANT MARINE CIRCULAR MMC-224**

**To:** Ship-owners/Operators, Fuel-oil Suppliers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates and Recognized Organizations (RO`s)

**Subject:** Control of the Fuel's Quality Guidelines

**Reference:** Marpol's Regulation 18(8.1) Annex VI,

1. The purpose of this circular is to inform about the establishment of control of the fuel's quality to be delivered on board ships by the bunker suppliers, specifically on the steps to be followed for the taking of samples demanded by MARPOL's Regulation 18(8.1) Annex VI.
2. For sampling location purposes, the sample of the fuel delivered to the ship, should be obtained at the receiving ship's inlet bunker manifold and should be drawn continuously throughout the bunker delivery period.
3. The primary sample is the representative sample of the fuel delivered to the ship collected throughout the bunkering period obtained by the sampling equipment positioned at the bunker manifold of the receiving ship.
4. For term of reference on the previous paragraph quoted of this Merchant Marine Circular, please take into account the information submitted within the Res. MEPC182 (59).
5. For bunkering operations, recall is make in addition to the standard procedures normally followed during bunkering, the following best practices relevant to the implementation of the Global Sulphur Cap, and the anticipated new grades of fuels to be used, recommended to be followed:
  - a) Two different grades of fuel oil shall never be bunkered into the same bunker tank;
  - b) If fuels of more than one sulphur grade are to be loaded through the same bunker hose/line, it is recommended that the fuel grade with the lowest sulphur content be loaded first followed by other grades in ascending order of sulphur content;
  - c) Ensure that after the delivery of each grade of fuel oil, the bunker hose and lines are properly blown through;
  - d) In case of disputes or PSC inspections, the MARPOL delivered sample will be used to verify the sulphur content of the fuel oil supplied to the ship. It is therefore very important that ship operators ensure that, as per the Guidelines for the Sampling of Fuel Oil adopted by IMO (MEPC.182 (59)), the MARPOL sample is always drawn from the receiving ship's bunker inlet manifold. If a bunker supplier refuses this arrangement, then a letter of protest should be issued to the supplier and the ship should independently take and store its own MARPOL sample drawn from the ship's manifold. Copies of the letter of protest should be sent to the Port State Control authority and the ship's flag State. A copy of the letter of protest should also be kept on board for potential inspections; and
  - e) It is recommended that a bunkered fuel oil should not be used until its laboratory analysis is completed and the results are known and confirmed to be in order.

## 6. Bunker Delivery Note & Representative sample

6.1 The bunker delivery note shall be kept on board the ship in such a place as to be readily available for inspection at all reasonable times. It shall be retained for a period of three years after the fuel oil has been delivered on board.

6.2 The bunker delivery note shall be accompanied by a representative sample of the fuel oil delivered taking into account guidelines developed by the Organization. The sample is to be sealed and signed by the supplier's representative and the master or officer in charge of the bunkering operation on completion of bunkering operations and retained under the ship's control until the fuel oil is substantially consumed, but in any case for a period of not less than 12 months from the time of delivery.

6.3 In case of the fuel oil delivered onboard, falling to comply with the requirements of regulations 14.1 or 14.4 of MARPOL Annex VI and the ship is unable to purchase fuel oil meeting the requirements of the cited regulation, then to follow instruction under the MMC 375 and the necessary FONAR to be fill in.

## 7. Flashpoint

7.1 SOLAS Regulation II-2/4.2.1.1 requires that the minimum flashpoint of any fuel used by the vessel or carried in its tanks must not be less than 60°C. Fuels with a lower flashpoint do not comply with the requirements of SOLAS and, more importantly, create an increased risk of fire and explosion. Consequently, the flashpoint of a fuel supplied to the ship should be properly verified by checking the documentation provided before bunkering operations commence.

Note: This MMC to start into force since 1/January/2020.

### ***December, 2019***

***– Added IMO Resolutions and Circulars, At reference on title.***

***-Changed contain of the existing paragraphs, in especially of paragraph No. 2.***

***-Addition of new paragraphs (3 to 7.1).***

**June, 2011.**

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