



NATIONAL SHIPPING ADJUSTERS



TECHNICAL LETTER No 19/2020

FROM: NASHA Technical Department
 TO: NASHA exclusive surveyors, vessels
 SUBJECT: IMO 2020
 DATE: FEBRUARY 26th, 2020

Dear Exclusive Surveyors,

By this letter, inform to our exclusive surveyor about the guide for to effective verification to compliance regulation IMO 2020.

NON COMPLIANCE	DESCRIPTION	REGULATION
Bunker Delivery Note	Missing, incomplete, not as required	Marpol Annex VI Rule 18.3 MEPC 286 (71) MN 10
Ships Log Books, including Fuel Change Over Procedures	Missing, incomplete, not as required	Marpol Annex I Rule 17 MMC 375 MN 10
Fuel oil Non Availability Report (FONAR)	Incomplete, Non Evidence, Notify to Administration and next port of call	Marpol Annex VI Rule 18.1 MEPC 320 (74) MMC 375
Evidence of Purchase Attempts	Not provided, not sufficient, not complete	Marpol Annex VI Rule 18.1 MMC 375
Exhaust Gas Cleaning Systems (Scrubbers)	Type Approval not onboard Not records operation Malfunction procedure	Marpol Annex VI Rule 4 MEPC 259 (68) MN11
Emission Reduction Method Approval Document or Trial Approval	Missing, incorrect entries, incomplete, invalid Commissioning in progress	Marpol Annex VI Rule 3 MEPC 176 (58) 106-OMI-80-DGMM



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Change Over	Too late, not complete, not documented	MMC 375 MN 10
Sampling	Technically impossible, no standard sample, no approved way, unsafe, unrepresentative sampling point; refusal by ship	Marpol Annex VI Rule 18.3 MEPC 320 (74) MMC 375

Please find attached for your reference and waiting for your confirmation of "SAFE RECEIPT, READ and UNDERSTANDING".


Many thanks and best regards,
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