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To: Shipowners / Ship Managers, Masters, Officers and Crewmembers.

Dear Sir/Madam,

Port State Control Detention in Sulphur Emission Control Areas (SECA)

As of 1 January 2015, port States in the EU regions start ensuring that ships entering their regions are using fuels with a sulphur content of no more than 0.10%. Higher sulphur contents are still possible, but only if the appropriate exhaust cleaning systems are in place.

Recently, three Hong Kong registered ships were detained (two in the Netherlands and one in Hamburg) for reasons of using fuels with a sulphur content of over the 0.10% limit. One ship was found having a leaking change over valve and hence cross contamination, the other two were using fuels above the limits but with compliant bunker receipts.

Marine Department (MD) is deeply concerned with these fuel sulphur content detentions and wishes to draw the attention of all concerned parties on the followings:

- i) proper bunker delivery notes should be kept and retained onboard for a period of three years;

- ii) samples of the fuel oil delivered should be sealed by the bunker supplier and ship's officer and retained until the fuel oil is substantially consumed;
- iii) make suitable arrangements for laboratory analysis of the sulphur content of low sulphur fuel just bunkered;
- iv) a written procedure for fuel oil change-over should be maintained and followed, and allowing sufficient time for the fuel oil service system to be fully flushed of all fuel oil exceeding 0.10%, prior to entry into a Sulphur Emission Control Area (SECA);
- v) fuel oil change-over plan or records of change-over and fuel oil transfer activities should be retained for reference of PSCOs;
- vi) tank for low sulphur fuels should be a dedicated tank, clean and separated from other the fuel oil tanks to avoid possible contamination;
- vii) in case of discrepancies between the bunker delivery note and laboratory result on the sulphur contents of the low sulphur fuel taken, this should immediately be followed up with or protest against the bunker supplier and to inform MD as well as the port States which the ship will arrive at the soonest possible.

Should you have any queries in this circular letter, please do not hesitate to contact the Cargo Ships Safety (CSS) Section at telephone number (852) 2852 4510 or by e-mail to "ss_css@mardep.gov.hk".

Yours faithfully,

No signature on website copy

(K.F. KWAN)

Senior Surveyor/Cargo Ships Safety Section
for Director of Marine