



TECHNICAL ALERT No. 16-42

Marine Fuel Sulphur Content Testing in Canada

1. Introduction

- 1.1. A new bulletin has been issued by Transport Canada advising on further enforcement of Sulphur Oxides (SOx) emission compliance through on board testing of fuel sulphur content during Port State Control (PSC) inspections.
- 1.2. The Bahamas Maritime Authority (BMA) wishes to bring the information referenced in Paragraph 2 to the attention of interested parties.

2. Announcement by Transport Canada

- 2.1. Transport Canada, the Canadian Government agency responsible for PSC inspections, published Ship Safety Bulletin 08/2016 on 18 August 2016. The Ship Safety Bulletin is available by clicking [here](#).
- 2.2. The Bulletin informs stakeholders that Transport Canada Marine Safety Inspectors will commence verifying compliance with Regulation 14.4.3 of Annex VI of the *International Convention for the Prevention of Pollution from Ships 1973, as amended* (MARPOL Annex VI) through on board fuel sampling and testing as of 22 August 2016.
- 2.3. The tests may be conducted as part of PSC inspections to confirm that the sulphur content of fuel oil used on ships, whilst in the Canadian sector of North American Sulphur Emission Control Area (SECA), does not exceed 0.1% m/m.
- 2.4. Transport Canada inspectors will use portable fuel analysers to measure the sulphur content of the fuel oil, in order to verify compliance with the North American SECA limits. Test results will help inspectors to make informed decisions when considering potential enforcement actions.
- 2.5. Testing will not apply to following categories of ships:
 - i. Ships utilising Sulphur Emission Control Systems (exhaust gas scrubbers, etc.);
 - ii. Ships using non-petroleum based fuels;

- iii. Foreign ships powered by a propulsion boiler that was not originally designed for continuous operation on marine distillate fuel or natural gas;
 - iv. Ships operating under an exemption or equivalence issued under Regulations 3 or 4, respectively, of MARPOL Annex VI;
 - v. Canadian ships operating under a fleet averaging program or exemption.
- 2.6. During PSC inspections, the attending inspector may require a sample from the engine's fuel system to be drawn and analysed using the portable fuel analyser. The sample may be drawn from the fuel system of any engine, either in operation or not, at the moment of inspection.
- 2.7. Depending on the result of on-board analysis, the sample may be sent for further analysis in an accredited laboratory at the discretion of the inspector. Where the portable analyser is not available, the inspector may forward the sample to an accredited laboratory for analysis.
- 2.8. The Transport Canada sampling and testing arrangements appear to be similar to the existing sampling and testing provisions by the Maritime Inspectorate of the Netherlands, which have been in force since 01 January 2015. Further information can be found in ILENT notice [here](#).
- 2.9. The BMA encourages owners and operators of Bahamian ships engaged on voyages to Canadian ports to share the information provided in this Technical Alert with its ships, to raise awareness of the new fuel sulphur content testing arrangements.

3. Validity

This alert is valid until further notice.

4. Revision History

Rev.0 (16 September 2016) – First issue