



REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF TRANSPORTATION
MARITIME INDUSTRY AUTHORITY

MARINA ADVISORY

NO. 2024-35

Series of 2024

TO : ALL CONCERNED SHIPOWNERS, SHIP OPERATORS, SHIP MANAGERS, MASTERS AND OFFICERS OF PHILIPPINE REGISTERED SHIPS ENGAGED IN THE DOMESTIC TRADE

SUBJECT : **SUPPLEMENTAL GUIDELINES ON THE IMPLEMENTATION MONITORING AND ENFORCEMENT OF MARINA CIRCULAR NO. SR-2020-06 ON LOW SULPHUR CAP**

Pursuant to MC No. SR 2020-06 "*Rules and Regulations on the Mandatory Use of 0.50% M/M Sulphur Limit on Fuel Oil for all Philippine Registered Ships in Compliance to Annex VI of MARPOL 73/78, as amended*", all concerned are hereby directed to observe herein supplemental guidelines on the implementation, monitoring and enforcement of the subject Circular:

1. Coverage

- .1 MARINA MC No. SR2020-06 specifically covers ships which are utilizing **heavy sulfur fuel oil and are therefore mandated to shift to fuel oil with low sulfur content of .50% m/m or below, effective 01 January 2025.**
- .2 Ships which are already using Distillates¹ (MGO, MDO, IDO) or Blends may shift to fuel oil with .50% mass/mass sulfur content and are required to accomplish a Ship-specific Implementation Plan (SIP) to be attached to the Ship's SMS Manual.

2. Ship-specific Implementation Plan (SIP)

- .1 The SIP is mandatory for all ships which will change from heavy sulfur fuel oil (HSFO) to fuel oil **with low sulfur content of .50% m/m or below.**
- .2 The SIP should include risk assessment and management and the same shall be integrated in the ship's *Safety Management Manual*.
- .3 The SIP shall be annexed to the *Safety Management Manual* of the ship and shall form part of the documents to be audited by the Administration.

3. Monitoring and Enforcement

- .1 The Survey and Certification shall be conducted by the Administration (for domestic ships) OR by its Recognized Organization (ROs) for overseas ships

¹ Marine Gas Oil, Marine Diesel Oil, Industrial Diesel Oil

- .2 Shipping companies shall at all times keep a record of fuel oil documentation issued by its supplier. For purposes of this Advisory, "supplier" means a DOE-accredited or recognized supplier or bunker trader which directly supplies the ships or the shipping company's fuel storage facility
- .3 The sulfur content of the fuel oil delivered direct to the ship or through fuel oil storage tank / facility of the shipping company shall be documented through a *Bunker Delivery Note (BDN)*² compliant with Regulation 14.5 of MARPOL Annex VI as a standard document required by the Administration which contains information on fuel oil delivery.
- .4 The BDN shall be safekept within one (1) year from the date of issuance.³
- .5 The BDN shall be accompanied by a representative sample of the fuel oil delivered, also known as **MARPOL Delivered Sample** to be retained by the vessel/shipping company.
- .6 The *MARPOL Delivered Sample*⁴ is **sealed and signed by the Supplier's representative and the Master or Officer-in-Charge** of the bunker operation.
- .7 Recognizing the inherent level of test variability for in-use and on-board samples, this Administration adopts the IMO's maximum limit of 0.53% sulfur content **for samples drawn on-board**. Refer to the illustration annexed hereto as "A".

4. Information sharing related to non-compliances

The information of non-compliance of domestic ships and/or fuel oil suppliers shall be reported to the Administration copy furnished to the Oil Industry Management Bureau of the Department of Energy (DOE). Meanwhile, for overseas ships, the Report on non-compliance shall be reported by the Administration or its Recognized Organizations (ROs) to the IMO's GISIS Module (Regulation 11.4) of the MARPOL Annex VI.

5. Non-Availability of Low Sulphur Fuel Oil

In case of non-availability of LSFO, the shipping company shall submit a Fuel Oil Non-Availability Report (FONAR) using the template attached as "C", duly Certified by the Supplier.

6. Fines and Penalties

"No sail condition until compliance" means that the ship cannot proceed to its next port of destination until the non-compliant fuel oil has been removed from the ship.

² Regulation 14.5 of MARPOL Annex VI

³ Regulation 18.8.1 of MARPOL Annex VI

⁴ Ibid

7. Transitory Provision

The Administration may extend the compliance deadline based on the SIP timelines as verified by MARINA, but not to exceed five (5) years. No extension of deadline shall be allowed if there is no SIP submitted as of 01 July 2024.

A Letter of Approval will be issued by MARINA on item 7, and the same shall be presented upon inspection.

This Advisory is effective immediately and remains in force until an amendatory Circular has been issued.

For compliance.

FOR: 
SONIA B. MALALUAN
Administrator

10/22/2024