To Whomsoever it may concern

Subject: Internal transfer of fuel oil from cargo to bunker tanks in OSVs

Bunkering being a critical operation with high potential of safety and environment hazards, it is required that transfer, storage and handling of bunker is undertaken with utmost care and caution. DGS through M.S. Notice Notice 3 of 2014 required bunkering checklist (as in Appendix-3 of the notice) to be fully and properly completed by the Master of the ship prior to commencement and also at each integral stage of every bunkering operation. This bunkering check list is required to be further kept on board for verification by competent authorities.

Queries have been raised regarding completion and use of the bunkering checklist on Offshore Supply Vessels especially while carrying out internal transfer of oil from cargo tanks to bunker tanks for vessel’s own use as fuel (allowed as per Corrigendum 1 to Engineering Circular 4 of 2013).

In respect of above, clarification was sought from DGS who through their letter ref: ENG/RSC/1400 (414), dated 13th July 2015 addressed to IRS has clarified as follows:

Quote
“Bunkering operations are governed in general term internationally, by the MARPOL Annex I & VI. SOLAS Chapter VI Regulations 5.1 also requires that a Material Safety Data Sheet be provided for oil products carried on board ships. In addition to the IMO regulations, many states, and even individual ports, have their own regulatory regimes covering bunkering operations. It is of paramount importance that prior to commencement of any bunkering operation, a check is made with the local agent and/or bunker supplier for information and guidance pertaining to the local regulations. Therefore, it is hereby informed, that the checklist cannot be totally done away with, but can be modified to suit the internal transfer requirements and may include, but not limited to the following:

a. The filing of the BDN as per procedure laid down in the MS Notice 3 of 2014, sect.4.4;
b. Retaining a sealed sample of the bunker oil as per IMO guidelines;

c. Ensuring the fuel oil quality and preventing co-mingling of different products;

d. All events and operations are to be carefully entered in both the Deck and Engine log books respectively and checks made that the appropriate entries in the Engine Room Oil Recode Book are also made.”

Unquote

Shipowners/managers are requested to be guided by above.

**Enclosure:**

1) Nil