

Circular From GARD

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Prepare for environmental inspections in China

China launches a year-long inspection campaign on ‘Ship Pollution Control’ in the Hainan Province as part of its efforts to reduce air and water pollution associated with shipping.

According to Gard’s local correspondent, Huatai Insurance Agency & Consultant Service Ltd, the Chinese Maritime Safety Authority (MSA) has announced that it will conduct an inspection campaign on ‘Ship Pollution Control’ at ports in the **Hainan Province** between **3 November 2017** and **3 December 2018**. The inspections will focus on compliance with MARPOL Annex VI on air emissions as well as the Ballast Water Management (BWM) Convention.

Please see our correspondent’s Circular No. [PNI 1713](#) of 30 November 2017 for additional information on the ongoing inspection campaign as well as an unofficial English translation of the original Notice published by the Hainan MSA on 3 November 2017.

Recommendations

Members and clients with vessels trading to China are advised to ensure vessels’ crew are aware of, and prepared for, the inspection campaign in the Hainan Province prior to calling at ports such as Yangpu, Haikou, Sanya and Basuo.

To demonstrate compliance with MARPOL Annex VI, bunker delivery notes and engine room logbook records must be up to date and readily available for inspection by the attending port state control officer (PSCO). Representative samples of the fuel oil delivered onboard must also be available. Please note that in accordance with MARPOL Annex VI Reg.18, bunker delivery notes shall be retained for a period of three years after the fuel oil has been delivered on board. Samples shall be retained under the ship’s control until the fuel oil is substantially consumed, but in any case for a period of not less than 12 months from the time of delivery.

As spot sampling and analysis of a ship’s fuel is becoming increasingly common as a means for PSCOs to verify the actual sulphur content of the fuel in use, ship’s procedures should ensure that samples of fuel can be drawn safely from the ship’s fuel service system when requested by the attending PSCO.

There are currently no designated emission control areas (ECAs) in the Hainan Province, i.e. the sulphur content of any fuel oil used on board ships shall not exceed the global 3.50% limit applicable until 1 January 2020. However, ships using separate fuel oils to comply with ECA regulations in other parts of the world should always be prepared to demonstrate how the fuel oil change-over is done and recorded.

To demonstrate compliance with the BWM Convention, the BWM Certificate, BWM Plan and BW Record

Book must be up to date and readily available for inspection by the attending PSCO. Inspections are likely to focus on ships' equipment and procedures for disposal and discharge of ballast as well as the crews' familiarity with the same.

Source of Information: Gard P&I Club

Andrew Liu & Co. Ltd