



Maritec Tanker Management Pvt Ltd

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GENERAL CIRCULAR

05/2020

Date: 29th Apr 2020.

TO: Fleet

**Subject: 1) Discrepancies in Bunkers ROB's is considered and act of Smuggling by PSC's/Port Authorities
2) Guidelines for Bunkering**

Dear Masters/Chief Engineers,

During a recent PSC Inspection onboard one of our vessels the Master & Chief Engineer were on the verge of imprisonment because there was a 15MT discrepancy in MGO ROB between the Logbook & Actual Figures. The Master & Chief Engineer were subjected to a very harassing experience ashore and finally permitted to return but not before the vessel was fined 33,000 – Euros. The reason for this being, as per the Custom Officials who boarded the vessel, *any* discrepancy in Bunker Figures is considered an act of *Smuggling* and hence, a Criminal Offense.

With immediate & permanent effect – PLEASE ENSURE THAT THERE ARE NO DISCREPANCIES IN THE LOGBOOK BUNKER FIGURES AND ACTUAL ROB ON BOARD.

Not forgetting that in reality, there are occasions when such a discrepancy could arise and that being during bunkering.

Which then brings us to highlight related procedures (SMS Manual – Chapter 10.42) to follow during bunkering operations (of which some would already be stated in the ISM Forms ECR 2.1- 2.2 – 2.3 – 2.4 – 2.5 – 2.6):

- Should a discrepancy arise between the Logbook figure and the Actual ROB, First inform to office urgently & make official log entry of it. The reference figure must be the actual bunker ROB for calculating any consumption.
- The vessel *must* ARRIVE and DEPART from every Port of call, with ZERO Discrepancy between the Logbook & Actual Onboard Bunker figures.
- A responsible ship's officer must witness and record the Bunker Barge flow-meter readings and temperatures, prior to commencement, during bunkering and after completion of the bunker operations. If there are no satisfactory calibrated metering arrangements available, then he is to witness and record all tank ullages of the bunker supply barge or shore tanks, as applicable, together with the fuel temperature in each tank in order to ascertain the initial bunker quantity prior operation.
- The vessel must be fitted with a proper "Line Sampler" device/flange and the use of a secure cubitainer /container is a MUST. Invite the Bunker Barge representative to witness the sampling on the ship's manifold.



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- Ensure / witness that during the entire bunkering process, continuous oil drip samples are taken at the agreed point of custody transfer (ship's or bunker barge manifold); well stirred upon completion of bunkering and filled into four (4) sample bottles, sealed and then signed by the Bunker Barge representative and the Chief Engineer. Two (2) sealed samples are to be retained by the vessel onboard and the other two (2) samples are for the Bunker Barge representative.
- It is very important that whilst filling, sealing and signing the sample labels, the sample bottles are never allowed to get out of your sight, i.e. *do not accept any sealed bottles where you have not witnessed their filling and sealing personally. Never allow the supplier's representative to disappear with the sample bottles for sealing etc as it is a good opportunity for them to swap sample bottles with different contents. Never sign any labels in advance but only when they are ready to be secured /glued to the sampling bottles.* The sample bottles should have a note as to the origin of the samples (i.e. shore tank/ pipeline, bunker barge etc.).
- Document the manner the Bunker Barge is taking samples as it can be vital in showing whether such samples were taken properly.
- If there is a discrepancy of 2.5 MT or more (on a bunker order of 100MT and less) and 5.0 MT or more (on a bunker order greater than 100 MT), between the BDN and what the vessel has actually received, then Master *must* inform Rubis Asphalt Middle East DMCC, *before* signing the BDN. Should this discrepancy not be resolved, then a Letter of Protest (LoP) is to be issued to the supplier when signing the BDN. This LoP must be attached to the signed BDN.

The figures to be entered in the *Engine Logbook and Oil Record Book*, should be the *Actual Quantity* of Bunkers the vessel has received, For comparison purpose also enter the BDN figure.

- Never allow any air-blowing of the bunker hoses after completion or even during the operations which may cause a "cappuccino-effect" and may give misleading quantity readings/soundings. Further, it is also a safety hazard.
- The Bunker Barge should normally furnish the specification of the bunkers & MSDS sheet they are going to deliver. If they do not provide the specification, then the BDN should be claused by the Chief Engineer "*quality unknown - samples taken and sealed*". If this clause is not acceptable to the Bunker Barge representatives then the appropriate notations must be made in the deck and engine logbooks.
Never pre-sign any supplier documents before the bunker delivery is satisfactorily completed, unless the documents are related to Safety - and Communication procedures.
- Vessel must receive the 'fresh bunkers' in those tanks which are empty. *Co-mingling of Bunkers is strictly prohibited unless prior written approval from MTM PL has been taken.*

Kindly discuss the same during the next Safety / Management meeting on board and ensure compliance.

The above circular will be incorporated into the company's SMS at next revision.

Thank You,

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