



LOSS PREVENTION UPDATE

LATEST AMENDMENT TO MARPOL ANNEX VI, APPENDIX V

Effective from 1 May 2024, the latest amendment to [MARPOL Annex VI, Appendix V](#) “Information to be included in the bunker delivery note”, brings changes to the documentation requirements on bunker delivery notes (BDN).

The amendments, adopted by the Marine Environment Protection Committee (MEPC), increase the information needed in BDN. Previously, the BDN required documentation of density and sulphur content. However, the latest addition mandates the inclusion of the flashpoint of fuel oil.

Now, the BDN must incorporate the tested flashpoint, ensuring compliance with the current standards, or provide a statement indicating that the flashpoint has been measured at or above 70°C. The testing standard is specified in the footnote as “ISO 2719:2016, *Determination of flashpoint – Pensky-Martens closed cup method, Procedure A (for Distillate Fuels) or Procedure B (for Residual Fuels)*.”

In practical terms, suppliers must provide an exact measured flashpoint value on the BDN if measured at or below 69°C OR a statement would be adequate if the flashpoint has been measured at or above 70°C. However, suppliers may still decide to provide the actual flashpoint measurement on the BDN for values above 70°C.

Please note that the flashpoint limit remains unchanged; it remains at no less than 60°C for all oil fuels unless otherwise specified for emergency generators, where oil fuel with a flashpoint of no less than 43°C may be used (SOLAS Chapter II-2, Regulation 4.2.1).

After reviewing BDNs from various suppliers, it is evident that many have already incorporated flashpoint details, indicating proactive adoption of the forthcoming amendment. Additionally, most suppliers have chosen to report the actual flashpoint measurement derived from the ISO 2719 tests, which may be more useful for shipowners in certain fuel management scenarios. However, caution is advised, especially for bunker stems/deliveries in lesser-known ports or from lesser-known suppliers, as their system may not be fully compliant with the latest regulations in time.



In further alignment with these changes, the Maritime Safety Committee (MSC 106) has adopted amendments to SOLAS Chapter II-2. These amendments include requiring a pre-delivery declaration of conformity with regulation SOLAS II-2/4.2.1, and mandating the ship to receive a BDN specifying the flashpoint or a statement indicating the flashpoint has been measured at or above 70°C. Additionally, these amendments request contracting governments to undertake measures and actions in support of this initiative. They are expected to come into force on 1 January 2026, aligning better with the forthcoming changes to MARPOL Annex VI, Appendix V.

Shipowners are advised to prepare in advance for these amendments by reviewing their practices and ensuring their BDN adheres to the new requirements.

FURTHER INFORMATION

For further information, please do not hesitate to email lossprevention@tindallriley.com

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