



## TECHNICAL CIRCULAR No. 812 of 4<sup>th</sup> February 2024

To	All Surveyors/Auditors. All flags
Title	<b>Bunker Delivery Notes (BDNs)</b>
Reference	MARPOL Annex VI.

The IMO has formally confirmed the use of Bunker Delivery Notes (BDNs) in electronic format as an acceptable alternative to the conventional hard copy, if they conform to the regulations of MARPOL Annex VI.

This follows the 80th session of the Marine Environment Protection Committee, which agreed an additional unified interpretation to regulations 18.5 and 18.6 of MARPOL Annex VI concerning BDNs. It is now included in the updated consolidation circular MEPC.1/Circ.795/Rev.8.

### Bunker Delivery Note (BDN)

The updated interpretation relating to regulations 18.5 and 18.6 can be read in full below.

The minimum information to be contained in the BDN remains the same in hard copy or electronic format and is given in Appendix V of MARPOL Annex VI (also shown below).

An electronic BDN as supplied should also be protected against any edits/modifications/revisions and a verification method used to make authentication possible.

See interpretation for Regulation 18 MEPC.1/Circ.795/Rev.8, below.

A BDN in electronic format must equally be retained onboard for a period of not less than three years from the date of delivery and made readily available for inspection as required.

### Next steps

Certain ports are looking to implement electronic BDNs as part of a wider move towards digitalization, including documentation related to bunkering operations. Ship officers should be aware of these changes such as the method to digitally transfer an electronic BDN from the bunker barge to the receiving ship and the subsequent means to securely retain that electronic record onboard for not less than the required time period.

### Regulation 18

Fuel oil availability and quality

Regulation 18.5 reads as follows:

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"For each ship subject to regulations 5 and 6 of this Annex, details of fuel oil for combustion purposes delivered to and used on board shall be recorded by means of a bunker delivery note that shall contain at least the information specified in appendix V to this Annex."

Regulation 18.6 reads as follows:

"The bunker delivery note shall be kept on board the ship in such a place as to be readily available for inspection at all reasonable times. It shall be retained for a period of three years after the fuel oil has been delivered on board."

Interpretation:

For the application of these regulations, they should be interpreted as being applicable to all ships of 400 gross tonnage or above and, at the Administration's discretion, to ships of less than 400 gross tonnage.

The Bunker Delivery Note (BDN) required by regulation 18.5 is acceptable in either hard copy or electronic format provided it contains at least the information specified in appendix V to MARPOL Annex VI and is retained and made available on board in accordance with regulation 18.6. In addition, an electronic BDN should be protected from edits, modifications or revisions and authentication be possible by a verification method such as a tracking number, watermark, date and time stamp, QR code, GPS coordinates or other verification methods.

REFERENCES:

- Marine Environment Protection Committee

ATTACHMENTS: No

Kindest Regards,  
CONARINA Technical Office

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