



**GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
DIRECTORATE GENERAL OF PORTS & SHIPPING**



MARINE GUIDANCE NOTE-- MGN- 001/2026

Karachi, dated the 05 August 2026

Subject: ENTRY INTO FORCE OF AMENDMENTS TO SOLAS CHAPTER II-2 CONCERNING THE FLASHPOINT OF OIL FUEL — OBLIGATIONS OF SHIPOWNERS, MASTERS, CHIEF ENGINEERS AND OIL FUEL SUPPLIERS

References

- (a) SOLAS 1974, chapter II-2, regulations 3 and 4, as amended by resolutions MSC.520(106) and MSC.550(108), in force 1 January 2026.
- (b) MARPOL Annex VI, regulation 18 and appendix V, as amended by resolution MEPC.360(79), in force 1 May 2024.
- (c) MSC-MEPC.2/Circ.18 — Procedures for verification of the flashpoint of oil fuel and for sampling.
- (d) ISO 2719:2016 — Determination of flash point, Pensky-Martens closed cup method (Procedure A for distillate fuels, Procedure B for residual fuels).
- (e) Pakistan Merchant Shipping Ordinance, 2001.

1. Purpose

1.1 This Circular promulgates, for the information and compliance of all concerned, the amendments to SOLAS chapter II-2 relating to the flashpoint of oil fuel, which entered into force on 1 January 2026, and notifies the arrangements made by this Administration to discharge the obligations placed upon Contracting Governments by those amendments.

2. Background

2.1 SOLAS regulation II-2/4.2.1 has long prohibited the use in machinery spaces of oil fuel having a flashpoint of less than 60 °C (closed cup test), subject to the limited exceptions provided in that regulation. Notwithstanding this prohibition, bunkers have repeatedly been delivered at international bunkering ports with a flashpoint measured well below 60 °C, presenting a serious risk of fire and explosion in machinery spaces where ambient temperatures routinely exceed that value.

2.2 The Maritime Safety Committee has therefore amended SOLAS chapter II-2 to place a positive documentary obligation on the oil fuel supplier before delivery, and to place corresponding obligations on Contracting Governments to investigate and act upon confirmed cases of non-compliant supply. These amendments complement the flashpoint entry in the Bunker Delivery Note required by MARPOL Annex VI since 1 May 2024.

3. Application

3.1 This Circular applies to:

- all Pakistan-flag ships to which SOLAS chapter II-2 applies, wherever they may be; and
- all persons and firms supplying oil fuel to ships within the ports and territorial waters of Pakistan.

4. Requirements applicable to ships

- 4.1 Prior to bunkering, the ship shall be provided with a declaration signed and certified by the oil fuel supplier's representative confirming that the oil fuel to be supplied is in conformity with SOLAS regulation II-2/4.2.1 and stating the test method used for determining the flashpoint.
- 4.2 The Bunker Delivery Note for the oil fuel delivered shall contain either the flashpoint determined in accordance with a standard acceptable to the Organization (reference (d)), or a statement that the flashpoint has been measured at or above 70 °C.
- 4.3 Where the pre-bunkering declaration is not tendered, or is incomplete, the Master and Chief Engineer shall not permit the transfer to commence until the document is provided. Where the supplier declines to provide it, the fact shall be recorded in the Engine Room Log Book and reported to the Company and to this Department in accordance with paragraph 6.
- 4.4 The declaration shall be retained on board together with the Bunker Delivery Note for a period of not less than three years from the date of delivery, and shall be produced on demand to surveyors of this Department, to Recognized Organizations and to Port State Control Officers.
- 4.5 The representative sample drawn under MARPOL Annex VI regulation 18.8.1 shall be retained on board and remain under the control of the ship until the fuel oil is substantially consumed, and in any case for a period of not less than twelve months from the date of delivery.
- 4.6 Where testing by an accredited laboratory, or shipboard indication, suggests that the flashpoint of a delivered fuel is below 60 °C, the Chief Engineer shall immediately:
 - cease or refrain from transferring that fuel to service and settling tanks serving machinery in the machinery spaces, and segregate the bunker so far as is practicable;
 - inform the Master and the Company without delay;
 - arrange for analysis of the MARPOL representative sample by an accredited laboratory using the method at reference (d); and
 - preserve all records, correspondence, test reports and samples pending investigation.
- 4.7 Attention is drawn to the fact that the exception permitting oil fuel of a flashpoint of not less than 43 °C is confined to the cases specified in SOLAS regulation II-2/4.2.1 (including fuel for emergency generators) and to the safeguards attached thereto. It does not constitute a general relaxation of the 60 °C limit.

5. Requirements applicable to oil fuel suppliers in Pakistan

- 5.1 Every supplier delivering oil fuel to a ship within the ports and territorial waters of Pakistan shall, before delivery commences, furnish the receiving ship with the signed and certified declaration referred to in paragraph 4.1.
- 5.2 Every supplier shall ensure that the Bunker Delivery Note contains the flashpoint particulars referred to in paragraph 4.2, and shall retain a copy for not less than three years.
- 5.3 Suppliers found to have delivered oil fuel which does not comply with SOLAS regulation II-2/4.2.1 will be liable to action by this Administration, which may include suspension or cancellation of licence or registration, in addition to any other action available under the law.

6. Reporting arrangements and designated authority

- 6.1 The Directorate General Port and Shipping Wing (DGPS), Karachi is hereby designated as the authority responsible, on behalf of the Government of Pakistan, for receiving reports of confirmed cases in which oil fuel suppliers have failed to meet the requirements of SOLAS regulation II-2/4.2.1, for taking appropriate action against such suppliers, and for informing the International Maritime Organization of confirmed cases for transmission to Contracting Governments and Member States.
- 6.2 Masters, Chief Engineers, Companies, Recognized Organizations and Port State Control Officers shall report confirmed and suspected cases to this Department in the format at Annex "A", accompanied by

the Bunker Delivery Note, the supplier's declaration (if any), the laboratory test report and the sample custody record.

- 6.3 Reports shall be addressed to the Chief Engineer & Ship Surveyor, Directorate General Port and Shipping Wing and may be transmitted by e-mail in the first instance.

7. Action by Recognized Organizations and Departmental Surveyors

- 7.1 Recognized Organizations acting on behalf of this Administration shall verify, at Safety Construction and Safety Equipment surveys and at ISM Code audits, that the Company's procedures for bunkering address the requirements of paragraphs 4.1 to 4.6, and that the required documents are held on board.
- 7.2 Departmental Surveyors and Port State Control Officers shall include verification of the pre-bunkering declaration and of the flashpoint entry in the Bunker Delivery Note in the scope of inspection. Where clear grounds exist, the MARPOL representative sample may be called for analysis.

8. Effect

- 8.1 The requirements referred to in this Circular have been in force since 1 January 2026. Immediate compliance is required. Non-compliance will be dealt with under the Pakistan Merchant Shipping Ordinance, 2001 and the rules made thereunder.

9. Enquiries

- 9.1 Enquiries arising from this Circular may be addressed to the Chief Engineer & Ship Surveyor (DGPS)

(Syed Ali Tahir Nasir)
Chief Engineer & Ship Surveyor and
Chief Examiner of Engineers

Annex -A

Report of Non-Compliant Oil Fuel Supply (Flashpoint)

Item	Particulars
Name of ship / IMO number / Flag	
Port and date of bunkering	
Name and address of supplier / barge	
Bunker Delivery Note number	
Grade and quantity delivered (MT)	
Flashpoint stated on BDN (°C)	
Pre-bunkering declaration provided (Yes / No)	
Flashpoint measured by laboratory (°C) and method	
Name and accreditation of laboratory	
MARPOL sample seal number / custody	
Action taken on board	
Reported by (name, rank, contact)	
Date of report	

Distribution

1. All Pakistan Flag Shipowners, Ship Managers and Operators.
2. All Recognized Organizations authorized by the Government of Pakistan.
3. Karachi Port Trust / Port Qasim Authority / Gwadar Port Authority — for circulation to licensed bunker suppliers.
4. All licensed oil fuel suppliers and bunker barge operators, Karachi and Port Qasim.
5. Principal Officer, Mercantile Marine Department, Karachi.
7. Director General Ports & Shipping (for information).
8. Office copy / MMD website.