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CIRCULAR 2020 Sulphur Cap Compliance

The global 0.50% m/m limit for sulphur in fuel oil used on board ships established by Regulation 14.1.3 of MARPOL Annex VI shall enter into force on 1 January 2020, as confirmed through IMO Resolution MEPC.280(70).

Notice to: [Ship Owners/ Managers/ Operators](#) | [Surveyors/Auditors](#)

[C19006](#) | 28 January 2019

The Marine Environment Protection Committee at its 70th Session, confirmed through [MEPC.280\(70\)](#), the effective date of implementation of the Fuel Oil Standard in Regulation 14.1.3 of MARPOL Annex VI that shall be 01 January 2020. The 0.50% sulphur limit is a significant reduction from the current global limit of 3.50% m/m which has been in place since 2012.

[Ship Implementation Plan](#)

The Marine Environment Protection Committee at its seventy-third session (MEPC 73), approved Resolution [MEPC.1/Circ.878](#) that provides guidelines on the development of Ship Implementation Plan for the consistent implementation of the 0.50% Sulphur Limit under MARPOL Annex IV, containing also an indicative template for such Implementation Plan.

The development and adherence to the ship specific Implementation Plan is highly recommended in order to ensure that the change to compliant fuel is achieved as smoothly as possible, helping the crew to better deal with the associated challenges.

Items recommended to be addressed through such a plan include: risk assessment and mitigation plan on the impact of new fuels (compatibility and stability issues); modifications of the fuel oil system and tank cleaning (if needed); fuel oil capacity and segregation capability; procurement of compliant fuel; fuel oil changeover and documentation and reporting.

A ship having on board a suitably developed Implementation Plan with corresponding records being maintained, could be in a better position during port State control. Attention is also brought to the Guidance on best practice for fuel oil purchasers/users for assuring the quality of fuel oil used on board ships, as per [MEPC.1/Circ.875](#).

[Paris & Tokyo MoUs Information Campaigns](#)

Paris and Tokyo MOU have launched a joint Information Campaign in order to facilitate smooth and consistent implementation of above requirement. This Information Campaign will run from 01 January 2019 until 31 December 2019.

The Maritime Authorities of the Paris and the Tokyo MoUs on Port State Control will start issuing a letter of warning from 01 January 2019 on the sulphur content of marine fuels during inspections in order to increase awareness of and to encourage timely

compliance with the new requirements. The letter of warning will be issued to ships found not yet ready for compliance with the relevant requirements that will enter into force on 01 January 2020.

From 1 January 2020 Port State Control Officers of the Paris MoU will check compliance with these regulations through the bunker delivery notes and related ships' log books and records and by means of sampling from the fuel lines. The following check boxes indicate the areas investigated:

- | | | |
|---|--------------------------------|--------------------------|
| 1 | SOx records | <input type="checkbox"/> |
| 2 | Sulphur oxides | <input type="checkbox"/> |
| 3 | Sulphur content of fuel used | <input type="checkbox"/> |
| 4 | Alternative arrangements (SOx) | <input type="checkbox"/> |

From 1 January 2020 Port State Control Officers will put further emphasis on the following items:

1. That the ship carries on board fuel oil with a sulphur content depending on the area of operation
2. There are records of the bunker delivery notes (BDNs) and associated samples or records thereof are kept on board
3. There are written procedures on board covering fuel oil change over operations where appropriate
4. That the Master and ship's personnel are familiar with essential fuel oil management procedures
5. That the ship has an appropriate approval for any installed exhaust gas cleaning systems, or equivalent means, if required

This list is to help Shipowners/ Managers/ Operators to prepare for compliance by 1 January 2020. If deficiencies are recorded against any of these items from 1 January 2020 action may be taken by the Port State Control Officer which may lead in a detention.

Early implementation of the 0.50% sulphur cap in China, Hong Kong & Taiwan waters

As of **01 January 2019**, vessels entering international commercial port areas in **Taiwan**, should use fuel oil with a sulphur content not exceeding the 0.5% m/m limit. The Ministry of Transportation and Communication (MOTC) clarifies exactly the ports that have enforced the early implementation of the use of compliant sulphur fuel oil. These are:

1. Port of Keelung;
2. Port of Taichung;
3. Port of Kaohsiung;
4. Port Hualien;
5. Port of Taipei;
6. Port of Suao; and
7. Port of Anping.

Similarly, from **01 January 2019**, ocean-going vessels (OGVs) shall use fuel oil with sulphur content not exceeding 0.5% m/m before entering **Hong Kong** waters. The Regulation also stipulates that the times when the OGV enters and exits the waters of Hong Kong, and information about the fuel switch operations must be recorded in a log book. Written procedures for conducting fuel switch operations must be implemented on board and the log book along with the bunker delivery notes must be kept on board the ship for a period of three years.

The Chinese Ministry of Transportation and Communications has announced that starting from **01 January 2019**, foreign vessels and flag ships sailing in international routes shall utilize low sulphur fuel oil (sulphur-bearing less than 0.5% by weight), or equipment or alternative fuels that achieve the equivalent effect of emission reduction when entering into the ports and offshore terminals under the jurisdiction of the **Republic of China**.

Act now

Ship owners / Managers / Operators are urged to develop implementation plans, outlining how the ship may prepare in order to comply with the required sulphur content limit of 0.50% by 1 January 2020. The plan could be complemented with a record of actions taken by the ship in order to be compliant by the applicable date.

For further information, please contact our Marine Division at marine@dromon.com