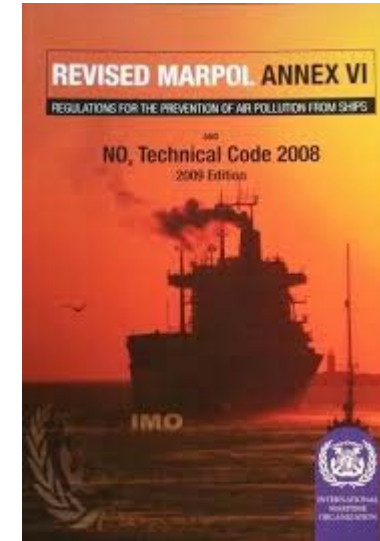
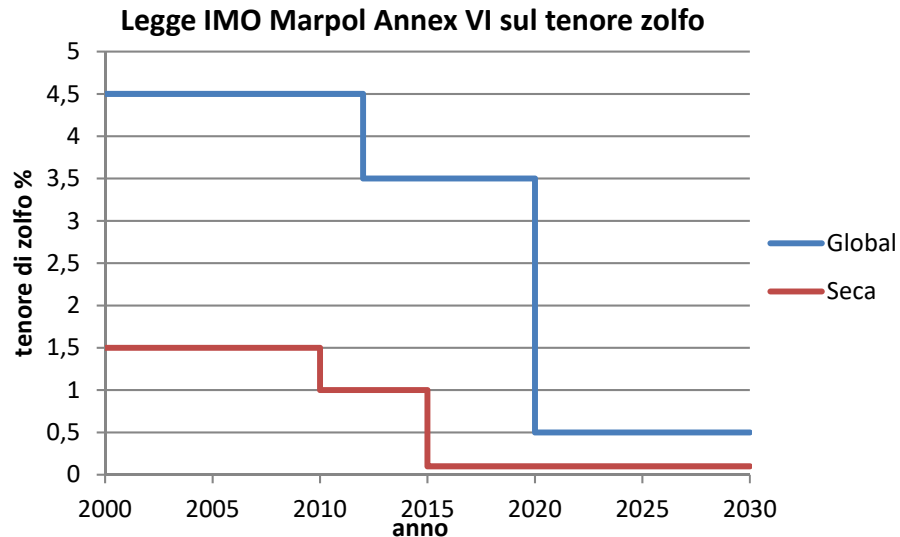


Global Sulphur Cap 0,5% from 1st January 2020



MEPC 70 agreed to "1 January 2020" as the effective date of implementation for ships to comply with global 0.50% m/m sulphur content of fuel oil requirement and adopted resolution MEPC.280(70) on the Effective date of implementation of the fuel oil standard in regulation 14.1.3 of MARPOL Annex VI.

«fuel ban» for HFO with Sulphur > 0,5%

On 26 October 2018, during its 73rd session on 22 - 26 October, the Marine Environment Protection Committee ('MEPC73') of the International Maritime Organization (the 'IMO') formally adopted the carriage ban on marine fuels with sulphur content above 0.50%. This was effected through approval of amendments to regulation 14 of Annex VI to the International Convention for the Prevention of Pollution from Ships ('MARPOL Annex VI') as laid down in the IMO document MEPC 73/3.

Whilst the 0.50% limit on sulphur in ships' fuel oil will apply from 1 January 2020 as planned, the carriage ban – i.e carriage on board a marine vessel of high sulphur marine fuel oil ('HSFO') with sulphur content above 0.50% will come into force on 1 March 2020, subject to few exceptions



CONFITARMA
Confederazione Italiana Armatori

Enforcement: LoW Letter of Warning

IMO No: AIRE5 9253210 Flag State: Italy
Date: 29/01/2019

LETTER OF WARNING
MARPOL Annex VI
Sulphur Oxides (SOx) and Particulate Matter (Regulation 14)¹

Dear Captain,

This letter is to bring to your attention the new regulations on sulphur content of fuel oils used on board from 1 January 2020. From that date all ships subject to MARPOL Annex VI are, in principle, required to use on board fuel oils with a sulphur content of maximum 0,50% m/m in accordance with MARPOL Annex VI regulation 14¹, or use alternative emission reduction and control technologies to comply with the emission standard.

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

Deficiencies in the areas listed above may be recorded by the Paris MoU if the regulations were in place now.

From the 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

This list is to help you 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 include a detention of the ship or other enforcements or administrative or corrective measures.

You are requested to inform the company of the above. Further details are given in MARPOL Annex VI Regulations 14 and 18.

On behalf of the Maritime Authority of Belgium

| | | |
|-----------------|-----------|------------|
| PSCO | Port | Date: |
| CLAUS HEYVAERTS | Antwerpen | 29/01/2019 |
| Alexis JOUKES | | |



¹As amended by MEPC.305(73)

EMSA

Directive 2009/16/EC on Port State Control

Revised Annex VI on October 2008, entry into force in July 2010 (with tigher emission limits)

EU Submission ISWG-AP 1/4/1 on Draft Amendments to Existing Guidelines for Port State Control under the revised MARPOL Annex VI (IMO Res. MEPC 181(59))

Letter of Warning on upcoming 0,50% sulphur content issued during all Paris/Tokyo MoU inspections

607 LoW issued since January 2019



CONFITARMA
Confederazione Italiana Armatori

Fuel Availability

It is still far from certain that sufficient quantities of compliant fuels will be available in every port worldwide by 1 January 2020



International
Chamber of Shipping

Shaping the Future of Shipping

MARPOL Annex VI Regulation 18.2 on fuel oil availability requires each Party to 'take all reasonable steps to promote the availability of fuel oils which comply with [Annex VI] and inform the [IMO] of the availability of compliant fuel oils in its ports and terminals'. Parties are also required to notify IMO when a ship has presented evidence of the non-availability of compliant fuel.

Concawe study on going for the 2020 Marine fuels 0.50%S supply in EU + collaboration with **Ensys** for a bigger picture (world). Preliminary results now expected soon. Fuel formulation: 2 main categories, Heavy fuels type (high viscosity and density) and distillate type; assessment on going, for EU should be 50 to 75% distillate type.



CONFITARMA

Confederazione Italiana Armatori

FONAR Fuel Oil Non-Availability Report

Evidencing non-availability of IMO 2020 compliant marine fuel

Regulation 18 of MARPOL Annex VI which governs fuel oil availability and quality, expressly requires each Party to “take all reasonable steps to promote the availability of fuel oils which comply with this Annex and inform the Organization of the availability of compliant fuel oils in its ports and terminals”. Thus ships that are not equipped with scrubbers or other equivalent arrangements will be able to present a Fuel Oil Non-Availability Report – a FONAR - to inspectors in ports who will then corroborate the accuracy of the report and notify the IMO and the EC about fuel oil non-availability.

Failure to present such a report and failure to corroborate its authenticity will be an offence and would subject the ship to a more detailed inspection and potential fines and/or prosecution.

Further details are awaited on the content of a FONAR and how the accuracy of the FONAR will be verified in practice.

FUEL Standards

in the absence of global standards for many of the new blended fuels that oil refiners have promised, there are some potentially serious safety issues due to the use of incompatible bunkers



International
Chamber of Shipping

Shaping the Future of Shipping

MEPC.1/Circ.875 26 April 2018 GUIDANCE ON BEST PRACTICE FOR FUEL OIL PURCHASERS/USERS FOR ASSURING THE QUALITY OF FUEL OIL USED ON BOARD SHIPS



Fuel specifications for new compliant fuel
New ISO 8217 standard unavailable until ~ 2022
Publicly available specification (PAS) likely available as interim solution

Two primary quality concerns for 2020 marine fuel are: Compatibility and Stability

IMO GUIDLINES



E

4 ALBERT EMBANKMENT
LONDON SE1 7SR
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

MEPC.1/Circ.878
9 November 2018

GUIDANCE ON THE DEVELOPMENT OF A SHIP IMPLEMENTATION PLAN FOR THE CONSISTENT IMPLEMENTATION OF THE 0.50% SULPHUR LIMIT UNDER MARPOL ANNEX VI

1 The Marine Environment Protection Committee, at its seventy-third session (22 to 26 October 2018), approved the *Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI*, as set out in the annex.

2 Member Governments are invited to bring the annexed Guidance to the attention of their Administration, industry, relevant shipping organizations, shipping companies and other stakeholders concerned.



E

4 ALBERT EMBANKMENT
LONDON SE1 7SR
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

MEPC.1/Circ.875
26 April 2018

GUIDANCE ON BEST PRACTICE FOR FUEL OIL PURCHASERS/USERS FOR ASSURING THE QUALITY OF FUEL OIL USED ON BOARD SHIPS

1 The Marine Environment Protection Committee, at its seventy-second session (9 to 13 April 2018) approved the *Guidance on best practice for fuel oil purchasers/users for assuring the quality of fuel oil used on board ships*, as set out in the annex.

2 Member Governments are invited to bring the annexed Guidance to the attention of their Administration, industry, relevant shipping organizations, shipping companies and other stakeholders concerned, as appropriate.

MEPC.1/Circ.878
GUIDANCE ON THE DEVELOPMENT
OF A SHIP IMPLEMENTATION PLAN
FOR THE CONSISTENT
IMPLEMENTATION OF THE 0.50%
SULPHUR LIMIT UNDER MARPOL
ANNEX VI

MEPC.1/Circ.875
And MEPC.1/CIRC.875/add.1
GUIDANCE ON BEST PRACTICE FOR
FUEL OIL PURCHASERS/USERS (and
suppliers on /add.1) FOR ASSURING
THE QUALITY OF FUEL OIL USED ON
BOARD SHIPS



CONFITARMA
Confederazione Italiana Armatori