



№ 5/CIRC/FSI

27 / February / 2020

To: All Ship Owners, Managers and Representatives of Ships under the Georgian Flag, Masters and Officers, Recognized Organizations and Georgia flag state inspectors

Reference: MARPOL Convention Annex VI

SUBJECT: Prohibition on the carriage of non-compliant fuel (IMO 2020)

1. Introduction

1.1 The main type of “bunker” oil for ships is heavy fuel oil, derived as a residue from crude oil distillation. Crude oil contains sulphur which, following combustion in the engine, ends up in ship emissions. Sulphur oxides (SO_x) are known to be harmful to human health, causing respiratory symptoms and lung disease. In the atmosphere, SO_x can lead to acid rain, which can harm crops, forests and aquatic species, and contributes to the acidification of the oceans.

2. Background

2.1 Use of 0.50% sulphur fuel outside ECAs was an element of the 2008 amendments to the MARPOL Convention in resolution MEPC.176(58) and entered into force on 1 July 2010. The implementation date of 1 January 2020 for the fuel oil standard in regulation 14.1.3 of MARPOL Annex VI was confirmed by resolution MEPC.280(70) and adopted on 28 October 2016.

2.2 To enforce these requirements, the IMO Marine Environment Protection Committee’s 2018 session (MEPC 73) also adopted a “carriage ban” of non-compliant fuel. This will enter into force on 1 March 2020. By that time, any unused non-compliant fuel not fully consumed prior to 1 January 2020, but kept onboard, has to be de-bunkered.

3. Prohibition on the carriage of non-compliant fuel

3.1 The Tokyo and Paris Memoranda of Understanding (MoUs) on port State control (PSC) have been working collaboratively to ensure that vessel owners and operators are aware that under the Authorities belonging to these MoUs, inspections will be undertaken to ensure compliance with the new sulphur limit requirements on marine fuel oil, from 1 January 2020.

3.2 These new requirements prohibit the use of non-compliant fuel from 1 January 2020 and the carriage of non-compliant fuel, for use on the ship, from 1 March 2020, unless the ship is fitted with an Exhaust Gas Cleaning System (EGCS).

3.3 During this information campaign the awareness among ships’ crew proved to be high, especially with respect to the requirements entering into force on 1 January 2020. Emphasis is therefore placed on the requirements entering into force on 1 March 2020 prohibiting the carriage of non-compliant fuel, for use on ships not equipped with EGCSs.

3.4 As noted in this circular, there are three options for ship owners and operators to comply:

- Use compliant fuel oil with sulphur content not more than 0.50% m/m;
- Use an alternative fuel, such as LNG, with a sulphur content of 0.50 % m/m or less; or
- Fit an alternative means of compliance, such as an EGCS approved under regulation 4 of MARPOL Annex VI.

4. Inspection

4.1 As from 1 January 2020, Port State Control Officers will put emphasis on the following items:

- That the ship carries on board fuel oil with a sulphur content depending on the area of operation.
- That from 1 March 2020, the sulphur content of fuel oil used or carried for use on board a ship shall not exceed 0.50% m/m unless approved alternative methods are installed.
- That the ship has an appropriate approval for any installed exhaust gas cleaning systems, or equivalent means, if required.
- There are records of the bunker delivery notes (BDNs) and associated samples or records thereof kept on board.
- There are written procedures on board covering fuel oil change over operations where appropriate.
- That the Master and ship's personnel are familiar with essential fuel oil management procedures.

5. Action to be taken

5.1 If deficiencies are recorded against any of these items, from 1 January 2020 (Sulphur content) or 1 March 2020 (carriage ban) action will be taken by the Port State Control Officer which may include detention of the ship or other enforcements or administrative or corrective measures.

5.2 All ships operated under the Georgia flag are urged to ensure compliance in order to avoid undue delays in ports.

Director

SIGNED/SEALED
ELECTRONICALLY 

Tamar Ioseliani

