

New sulphur requirements Are you in compliance?

New sulphur requirements from 1 January 2015
in sulphur emission control areas (SECAs)

Checklist for compliance

Before entering a SECA, you must check that you are in compliance and that you carry the necessary documentation on board. You should at least check the following:

Checklist (non-exhaustive)

Does the ship use fuels with a sulphur content not exceeding 0.1% to comply with the limits for SOx emission control areas?

- Have the alternative arrangements (e.g. scrubbers) installed on board been flag State approved?
- Are bunker delivery notes with details of fuel for combustion purposes kept available on board for a period of three years after the fuel oil has been delivered on board?
- Are representative sealed and signed samples of the fuel oil delivered on board available for the recent 12-month period?
- Where no approved alternative arrangements (e.g. scrubber systems) are used; is a written procedure available describing how a fuel oil change-over is to be made for achieving compliance with the requirements for max.0.10% sulphur content in the fuel oil used for entering or leaving SOx emission control areas?
- For ships entering or leaving SOx emission control areas; have details of the change-over of fuel oils been recorded in a logbook as prescribed by the Administration?



New requirements

On 1 January 2015, new requirements on the sulphur content of ships' fuels took effect. They are laid down in Annex VI of the IMO MARPOL Convention.

Why is this?

Ships emit sulphur dioxide (SO₂), which is produced by burning fossil fuels containing sulphur. SO₂ is a major air pollutant, which is toxic to humans, plants and animals as well as a main cause of acid rain. Recognizing this, the international Maritime Organization (IMO) has adopted stricter sulphur requirements.

What's new?

The new regulations mean that ships operating within Sulphur Emission Control Areas (SECAs) must use fuels with a maximum sulphur content of 0.10% - down from the previous 1% limit - or adopt alternative solutions resulting in an equivalent effect.

The new requirements are enforced strictly in all SECA countries as of 1 January 2015. Ships may be subject to inspection by national Port

State Authorities, and could be detained in order to ensure that a sufficient amount of compliant fuel is available on board.

How to comply?

Ship operators have three basic options to comply with the new requirements:

1. Use a fuel oil with a sulphur content not exceeding 0.10%.
2. Use approved abatement technology, e.g. scrubbers. This technology must be approved by the flag State and operated in accordance with MARPOL Annex VI, regulation 4.1.
3. Use an alternative fuel (LNG, biofuel).

To whom do these requirements apply?

The sulphur requirements apply to all ships (except warships, naval auxiliaries and other non-commercially used ships owned or operated by a State).

Overview of the SECAs

What is a seca

SECAs or Sulphur Emission Control Areas are designated areas with stricter sulphur emission limits. The designation of these areas is approved by the IMO.

At present, the following 4 SECAs have been designated:

- The Baltic Sea area (as defined in MARPOL Annex I, regulation 1.11.2).
- The North Sea area (as defined in MARPOL Annex V, regulation 1.14.6).
- The North American area (as described by the coordinates provided in Appendix VII to MARPOL Annex VI).
- The United States Caribbean Sea area (as described by the coordinates provided in Appendix VII to MARPOL Annex VI).



Further information

If you need additional information about the technical requirements, please contact your local flag State administration or relevant authorities in the port State.

Below you will find a list of contact points for the SECA countries.

Belgium	sulphur@mobiliteit.fgov.be
Denmark	mrb@dma.dk
Estonia	heiko.heitur@envir.ee
Finland	kirjaamo@trafi.fi
France	SM3.SM@developpement-durable.gouv.fr
Germany	ref-ws24@bmvi.bund.de
Latvia	vvd@vvd.gov.lv
Lithuania	v.tilvikas@kld.am.lt
Netherlands	meindert.vink@ilent.nl
Norway	sveinerik.enge@sjofartsdir.no
Poland	sekretariatDTM@mir.gov.pl
Russia	kharchenko@marsat.ru
Sweden	sjofart@transportstyrelsen.se
United Kingdom	PSC_Headquarters@mcga.gov.uk
USA	HQS-PF-fldr-ECA-Foreign@uscg.mil

Violations

The Norwegian Maritime Authority may impose violation fines on the company that willfully or negligently violates the sulphur requirements. In deciding whether a violation fine shall be imposed on the company, and in assessing the fine, particular consideration shall be paid to the

seriousness of the violation, whether the company could have prevented the violation, whether this is a repeated offence and the company's financial capacity. Violation fines will be assessed to ensure that the fines at least deprive the economic benefits derived from the violation.