



Merchant Shipping Directorate



PREPARING FOR THE IMPLEMENTATION OF THE 2020 SULPHUR LIMIT

Technical Notice MARPOL.8

*Notice to Ship-owners, Ship Operators, Managers, Masters,
Owners' Representatives and Recognized Organizations*

The Directorate would like to remind all concerned that 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 affirmed through IMO Resolution MEPC.280 (70). This Regulation limits sulphur in fuel oil to 0.50% (except for ships using 'equivalent' compliance mechanisms) when operating outside of designated Emission Control Areas.

Attention is also drawn to IMO Resolution MEPC.305 (73) on the Prohibition on the Carriage of Non-Compliant Fuel Oil for Combustion Purposes for Propulsion or Operation on board a Ship, which prohibits the carriage of fuel having a sulphur content above 0.50% as from 1 March 2020.

Development of a Ship Implementation Plan

The 2020 0.50% m/m sulphur cap will entail advance planning and preparation in order to ensure effective implementation and compliance.

In order to help guide the transition, the IMO has adopted *Guidance on the Development of a Ship Implementation Plan for the Consistent Implementation of the 0.50% Sulphur Limit under MARPOL Annex VI*, containing an indicative template for such an Implementation Plan (MEPC.1/Circ.878).

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.

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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 and any other third party inspections to provide documentary and *prima facie* evidence that the ship is in compliance with the above-mentioned regulation.

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 (MEPC.1/Circ.875).

Paris MOU and Tokyo MOU joint Information Campaign

In anticipation of the implementation of the said Regulation, the Paris MOU and Tokyo MOU have launched a joint Information Campaign in order to facilitate smooth and consistent implementation of the said requirement. This Information Campaign will run from 1 January 2019 until 31 December 2019.

In order to increase awareness and to encourage timely compliance with the new requirements, a letter of warning will be issued to ships found not yet ready for compliance with the relevant requirements. The relevant Paris MoU Press Release together with a specimen of the warning letter may be accessed at:

<https://www.parismou.org/early-warning-global-2020-sulphur-cap-compliance>.

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