POLLUTION PREPARATION AND RESPONSE

Comments on document MEPC 74/10

Submitted by ICS

SUMMARY

Executive summary: The document provides comments on the draft 2019 guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI that were agreed at PPR 6, and presents related information on an industry guidance to shipping companies and crews on preparing for compliance with the 2020 global sulphur limit for ships’ fuel oil in accordance with regulation 14 of MARPOL Annex VI.

Strategic direction, if applicable:

Output: 1.17

Action to be taken: Paragraph 7

Related documents: MSC 100/8/2; PPR 6/WP.5, PPR 6/8 and MEPC 74/10

Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the document on Organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies (MSC-MEPC.1/Circ.5/Rev.1) and comments on the report of the sixth session of the Sub-Committee on Pollution Prevention and Response (PPR 6). In particular, this document comments on paragraph 2.22 of document MEPC 74/10 (Secretariat).

Discussion

2 The Working Group on Prevention of Air Pollution from Ships established at PPR 6 was tasked with finalizing the draft guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI, using annex 2 to document PPR 6/8 as a basis and taking into account, inter alia, document MSC 100/8/2 (PPR 6/WP.5, paragraph 3.2). The
Working Group developed draft text for inclusion on "Possible safety implications relating to fuel oils meeting the 0.50% m/m sulphur limit" with an associated appendix based on document MSC 100/8/2 (PPR 6/WP.5, paragraph 30).

3 Paragraph 6.4 of the draft 2019 guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI (PPR 6/WP.5, annex 3; and PPR 6/20/Add.1, annex 12) recommends that reference should also be made to general industry guidance on potential safety and operational issues related to the supply and use of 0.50% maximum sulphur fuels.

4 To help shipping companies prepare for implementation of the global sulphur limit for ships' fuel oil, ICS with the support of the Asian Shipowners’ Association (ASA) and the European Community Shipowners’ Associations (ECSA) has produced, free of charge, some comprehensive guidance on implementation planning, to help ensure compliance across the shipping industry with this regulatory game changer. The Guidance has been prepared for the vast majority of ships that will comply with the global sulphur limit immediately after 1 January 2020 using fuel oils with a sulphur content of 0.50% m/m or less.

5 The guidance to shipping companies and crews on preparing for compliance with the 2020 global sulphur cap can be accessed at the following link: http://www.ics-shipping.org/free-resources/2020-sulphur-compliance

6 The ICS Guidance was first issued in September 2018. It has since been updated to take account of decisions made by MEPC 73. A further update is anticipated in order to include information on related outcomes from PPR 6 that are expected to be adopted by the Committee at this session. This includes the standard format for Fuel Oil Non Availability Report (FONAR), guidelines on sampling and verification, and guidance on the management of non-compliant fuel oil after the submission of a Fuel Oil Non-Availability Report (FONAR).

Action requested of the Committee

7 The Committee is invited to consider the information provided and take action, as appropriate.