Enforcement 2020 - regional and global perspectives

Symposium on IMO 2020 and Alternative Fuels, 17-18 October 2019
Denmark as a Coastal and Port State
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Enforcement

Fuel oil suppliers (Port/Flag States):

- Register of local suppliers of fuel oil
- Require that the fuel oil suppliers provide BDN and MARPOL-sample
- Encourage availability of compliant fuel oil
- Inform IMO and EU about fuel oil suppliers not complying with the requirements
- Sampling during delivery (EU)
Enforcement

Ships (Port/Flag State):

- Document inspection (BDN etc.)
- Fuel oil sample (EU)
- Guidelines for the control of scrubbers
- Information gathering and exchange (THETIS-EU/IMO-GISIS)
- “Targeting”
- Fuel oil sampling from fuel oil tanks
- Fuel oil ban (1 March 2020)
‘Sniffers’

➢ Great Belt Bridge – contract with Chalmers

➢ Air surveillance – contract with Explicit
Status

Status on the SECA experiences in Denmark:
➢ approx. 95% of the ships comply with the regulation (92-97%)
➢ Only a few serious non-compliances (>0.5% sulphur)
➢ Sulphur content in the air is reduced more than a half
➢ Legislative proposal on publication of gross non-compliant ships
➢ 2020: 0.5% global (outside SECA)
Enforcement

Contract with Saybolt Denmark (laboratory)
➢ DMA sends the fuel oil samples to the lab
➢ The results of the test analysis are sent to EPA

Action:
➢ Test results are registered in the THETIS-EU
➢ If the results are in violation of the sulphur regulation, a non-compliance alert is set up and DMA is informed
➢ Minor exceedances (0.11%) EPA will send an enforcement notice
➢ Exceedances of 0.12% and above are reported to the police
Denmark as a Flag State – the global enforcement challenge
Preparations – the IMO and beyond

IMO 2020
Taking bold action to clean up shipping emissions by reducing the sulphur content in ships’ fuel oil

WHAT?

• Reduced from 3.50% to 0.50%
• Significantly less sulphur permitted in ships’ fuel oil
• Drop in overall SOX emissions from ships (2020-2025)

WHEN?

• From 1 January 2020

AER POLLUTION & HEALTH

• Premature deaths avoided
• Significant reduction in shipping’s negative effect on human health through air pollution

CUTTING sulphur emissions helps prevent acid rain, which means:
• Less harm to crops, forests and aquatic species
• Lessening ocean acidification

WHERE?

• Health benefits felt globally
• Strongest in coastal communities
• Major impact in vulnerable areas

IMO 2020 - FAQs

What is the sulphur 2020 limit?

From 1 January 2020, the limit for sulphur in fuel oil used on board ships operating outside designated emission control areas will be reduced to 0.50% m/m (mass by mass), from 3.50% m/m.

This limit is set in Annex VI of the International Maritime Organization (IMO) International Convention for the Prevention of Pollution from Ships (MARPOL).

How can ships comply?

i) Use a compliant fuel oil with a sulphur content that does not exceed 0.50%.
ii) If exceeding 0.50%, use an equivalent equipment e.g. an Exhaust Gas Cleaning System ("scrubber").
iii) Use an alternative fuel e.g. LNG, methanol.
iv) Use onboard power supply when at berth.

What must ships do before 1 January 2020?

Ship operators and owners must plan ahead. IMO has issued guidance, including ship implementation and planning guidance.

Who is responsible for enforcement?

Monitoring and enforcement of the new limit falls to Governments and national authorities of Member States that are Parties to MARPOL, Annex VI.

Flag States are the State of registry of a ship and port States have rights and responsibilities to ensure compliance.

What is IMO doing to help implementation?

IMO has been working with Member States as well as the shipping industry, bunker suppliers and terminals to identify and mitigate transitional issues so that ships may meet the new requirement.

A range of guidance has been developed, including specific port State control guidelines and guidelines on consistent implementation.

Are there any exemptions?

If a ship simply cannot obtain compliant fuel oil, they can complete a "Fuel Oil Non-Availability Report (FONAR). This can be taken into account by port State control, but does not on its own.

WHERE CAN I FIND OUT MORE?

A list of IMO measures to support implementation of the 0.50% limit can be found opposite.

Please visit www.imo.org for further information.

IMO Instruments

Released non-exhaustive list of IMO Instruments:

TREATY

• MARPOL, Annex VI Regulation 18, including the 0.50% sulphur limit from 1 January 2020
• Amendments to MARPOL, Annex VI (Implementation of the FONAR System) (60th session of the Committee of Correspondence, 19 July 2019, enter into force from March 2021)

IMPLEMENTATION

• Guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL, Annex VI (MCP 60.14)

BEST PRACTICE

• Guidance on best practice for fuel oil purifiers for achieving the quality of fuel oil used on board ships (MCP 60.16)
• Guidance on best practice for fuel oil suppliers for assuring the quality of fuel oil supplied to ships (MCP 60.17)
• Guidance for best practice for Member States/Port State (MCP 60.18)

DEVELOPMENT

• Safety of compliant fuel oil by suppliers (IMO, MEPC 70.16)

IMPACTS

• Impacts recommendations to enhance the safety of ships operating the use of fuel oil (MEPC 70.17)

PORT STATE CONTROL / SAMPLING

• Guidelines for port State control under MARPOL, Annex II (mechanical and operational considerations) (MCP 60.14)
• Guidance for port State control on contingency measures for accommodating non-compliant fuel oils (MEPC 60.16)

PUBLIC INFORMATION

• Guidance on the provision and handling of information on the availability of fuel oil at ports (MEPC 60.16)

CIRCULARS

• Early application of the approved amendments to the said convention (1997, Annex VI, Fuel oil of standard quality (IMO 20.7)) (MEPC 286.8)
• Guidance on implementation of ongoing compliance in the context of the future of a single emergency instrument, and recommended actions to take if the Exhaust Gas Cleaning System (ECS) fails to treat the residues of the 0.50% fuel (MEPC 60.16)
• Reporting of adequacy of compliant fuel oil supplies (with regulation 15.1 of MARPOL, Annex VI (MCP 60.14)
• Reporting of data related to fuel oil availability, unit quality (MCP 60.16)
Sharing regional experiences with the world

International workshops on Sulphur Enforcement

Sharing of enforcement experiences from SECA regions

- Detections
- PSC
- Sanctions
- Data sharing
- Etc.
Thank you for your attention!