



# Technical Circular

No.: 093/2018

Date: 28<sup>th</sup> December 2018

**To whomsoever it may concern**

**Subject: DG Shipping, India Circular reg. 0.5% max limit of the sulphur content in fuel oil- Compliance with the provisions of MARPOL Annex VI Regulation 14.**

- DG shipping, India vide Engineering circular no. 05 of 2018 has provided guidance and requirements for Indian shipping companies regarding compliance with the provision of MARPOL Annex VI Regulation 14.
- As per MARPOL Annex VI Regulation 14, the sulphur content of any fuel oil used on board ships shall not exceed 0.5 % m/m on or after 01 January 2020 and carriage of fuel with sulphur content more than 0.5% on ships on or after 01 March 2020 is prohibited.
- The requirement related to carriage of non-compliant fuel oil is applicable to all ships except where equivalent means of compliance such as Exhaust Gas Cleaning Systems; as per MARPOL Annex VI Regulation 4, are provided. Also the ban on carriage does not apply to carriage of fuel oil with sulphur content more than 0.5% m/m as cargo.
- Salient points of the circular are as follows:
  1. It is to be noted that in case residual fuel oil with sulphur content not exceeding 0.5% m/m is not available but other grades of fuel oil such as gas oil, distillate fuel etc. with sulphur content not exceeding 0.5% m/m are available then the same will not be considered as non-availability of 0.5 % sulphur fuel oil as defined in MARPOL Annex VI Regulation 18.
  2. Administration has advised all the companies to develop a ship specific implementation plan for transition from high sulphur fuel oil to fuel oil with sulphur content not exceeding 0.5% taking into consideration MEPC.1/Circ.878-Guidance on development of a ship implementation plan for consistent implementation of 0.5% sulphur limit under MARPOL Annex VI. The plan is to be complemented with a record of actions taken by the ship in order to be compliant by the applicable date. Administrations and Port State Control authorities may consider the ship implementation plan as an evidence of due diligence by the ship owner when verifying compliance with 0.5% sulphur limit requirement.

3. For ships intending to use an Exhaust Gas Cleaning Systems (EGCS) for some or all of its fuel oil combustion machinery are required to comply with MEPC.259(68)-2015: Guidelines for Exhaust Gas Cleaning. Such ships are required to carry following documents on board:
  - a. SO<sub>x</sub> Emission Compliance Plan (SECP) approved by RO on behalf of Administration detailing the method of compliance for all fuel oil combustion machinery installed on board.
  - b. SO<sub>x</sub> Emission Compliance Certificate (SECC) issued by RO on behalf of Administration.
  - c. EGCS Technical Manual for Scheme A (ETM-A) or EGCS Technical Manual for Scheme B (ETM- B) as applicable duly approved by RO on behalf of Administration.
  - d. An Onboard Monitoring Manual (OMM) approved by RO on behalf of Administration.
  - e. EGC Record Book or Electronic Logging System.

Further it is reminded that wash water resulting from exhaust gas cleaning systems are not to be discharged into the sea, including enclosed ports, harbours and estuaries unless the wash-water meets the criteria set out in Resolution MEPC.259(68) and applicable local regulation.

4. Approved bunker suppliers are required to be guided by MEPC.1/Circ.875/Add.1- Guidance on best practice for fuel oil suppliers for assuring the quality of fuel oil delivered to ships and to ensure that fuel supplied to ships has a sulphur content not exceeding 0.5% m/m. In cases where ship is fitted Exhaust Gas Scrubbers the bunker supplier can supply fuel with sulphur content more than 0.5% m/m only after ensuring fitment of EGS from “Supplement to International Air Pollution Prevention Certificate” issued by flag or RO. A copy of same is required to be retained for records.
5. Bunker supplier may supply fuel oil with sulphur content more than 0.5% to ships (Indian and Foreign flag ships not fitted with EGS) in Indian Coastal waters only with prior approval of the Administration. The request for same is to be forwarded to [psc-dgs@nic.in](mailto:psc-dgs@nic.in) by concerned ship operator/companies and not by the bunker suppliers.

- Ship owners/ operators and masters are advised to be guided by above.

**Enclosure:**

1. DG shipping Engineering Circular No. 05 of 2018
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