



# Technical Circular

No.: 113/2020

Date: 05<sup>th</sup> September 2020

## **Subject: Discharge of washwater from Exhaust Gas Cleaning Systems**

1. MARPOL Annex VI, Regulation 14 mandates that the Sulphur content of any fuel oil used onboard ships outside Emission Control Areas shall not exceed 0.50% m/m. Further, amendments to MARPOL Annex VI prohibits the carriage for use onboard ships of fuel oil with Sulphur content more than 0.50% m/m. However, the prohibition does not apply to ships fitted with 'equivalent' means of compliance permitted by MARPOL Annex VI, Regulation 4, such as Exhaust Gas Cleaning System (EGCS).
2. Resolution MEPC.259 (68) specifies the requirements for the verification, testing, survey and certification of scrubber systems and sets out the criteria for discharging exhaust gas cleaning washwater into the sea.
3. It is to be noted note that a number of coastal States and ports have implemented local regulations with more stringent requirements that restrict or even completely prohibit the discharge of washwater from open loop exhaust gas cleaning systems in waters falling under their jurisdiction.
4. In view of above, Malta Administration vide Merchant Shipping Notice 161 has provided following guidance;
  - a. Ship owners/managers to ensure that their crews are familiar with the emissions and discharge limits in force in their trading areas. Furthermore, since the regulatory enforcement strategy may differ from one region/port to another, crews must be provided with clear procedures and guidance on this matter well in advance of the vessel's intended area of operation and port of call.
  - b. For vessels trading in areas where the discharge of scrubber washwater is not permitted, two options are available in order to ensure compliance with the sulphur limits, either to switch over to closed loop mode of EGCS operation in case of hybrid systems, or changeover to compliant fuel. Any changeover should be carried out well in advance of the vessel entering the areas with prohibition or restrictions in place.
  - c. Early changeover is highly recommended as this may help in identifying any operational issues that may arise and to take corrective actions in a timely manner.
5. Accordingly, it is recommended that shipowners and operators undertake the necessary actions to ensure that the systems are in compliance not only with the relevant IMO instruments but also with the regulations and the limits in force in their trading areas.



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. While we have taken utmost care to be as factual as possible, readers/ users are advised to verify the exact text and content of the Regulation from the original source/ issuing Authority.

This should be done at the earliest opportunity to avoid the risk of any detentions or unnecessary delays.

6. Ship owners/ operators and masters of ships fitted with EGCS are advised to be guided by above and ensure compliance.

**Enclosure:** Malta Merchant Shipping Notice 161

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Merchant Shipping Directorate



## DISCHARGE OF WASHWATER FROM EXHAUST GAS CLEANING SYSTEMS

### *Merchant Shipping Notice 161*

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

The Directorate wishes to remind all concerned of the requirements set out in MARPOL Annex VI and Directive (EU) 2016/802 limiting the sulphur content of marine fuels to 0.1% whilst operating in emission control areas, and the global sulphur limit of 0.5%, that became effective from 1 January 2015 and 1 January 2020 respectively; as well as regulating the use of exhaust gas cleaning systems.

Resolution MEPC.259(68) specifies the requirements for the verification, testing, survey and certification of scrubber systems and sets out the criteria for discharging exhaust gas cleaning washwater into the sea.

Notwithstanding the above, it is important to note that a number of coastal States and ports have implemented local regulations with more stringent requirements that restrict or even completely prohibit the discharge of washwater from open loop exhaust gas cleaning systems in waters falling under their jurisdiction.

It is imperative that owners/managers ensure that their crews are familiar with the emissions and discharge limits in force in their trading areas. Furthermore, since the regulatory enforcement strategy may differ from one region/port to another, crews must be provided with clear procedures and guidance on this matter well in advance of the vessel's intended area of operation and port of call.

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For vessels trading in areas where the discharge of scrubber washwater is not permitted, two options are available in order to ensure compliance with the sulphur limits, either to switch over to closed loop mode of EGCS operation in case of hybrid systems, or changeover to compliant fuel. Any changeover should be carried out well in advance of the vessel entering the areas with prohibition or restrictions in place. Early changeover is highly recommended as this may help in identifying any operational issues that may arise and to take corrective actions in a timely manner.

To this effect, it is recommended that shipowners and operators of Maltese registered ships undertake the necessary actions to ensure that the systems are in compliance not only with the relevant IMO instruments but also with the regulations and the limits in force in their trading areas. This should be done at the earliest opportunity to avoid the risk of any detentions or unnecessary delays.

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02 September 2020

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