



# Technical Circular

No.: 119/2020

Date: 12<sup>th</sup> October 2020

## **Subject: Use of EGCS (Scrubbers) in New Zealand Territorial Waters**

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. The New Zealand Ministry for the Environment (NZ MFE) as a precautionary measure, has released guidance on the use of scrubbers in New Zealand (NZ) territorial waters and requested owners/operators and Masters of ships operating in NZ territorial waters, to avoid discharging scrubber effluent close to shore and where possible utilize alternate options such as:
  - preparing for entry into NZ waters by carrying compliant low sulphur fuel to use when operating in sensitive environments as identified by the relevant regional authorities;
  - operating closed-loop scrubber functionality in zero-discharge mode and retaining any effluent on board until able to dispose of it at the next available port facility; and
  - discharging any open loop scrubber wash water outside NZ territorial waters.
5. Current IMO guidance on wash water discharge criteria, IMO Resolution MEPC.259 (68), may be revised in the future as more data becomes available on the contents of the discharge and its effects.
6. 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.

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

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