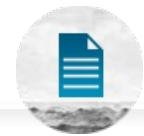


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What does the “IMO 2020” regulation really say? A quick guide



# WHAT DOES THE “IMO 2020” REGULATION REALLY SAY? A QUICK GUIDE

## Overview

The shipping industry has all eyes firmly fixed on the topic, but what exactly do the “IMO 2020” global sulphur cap regulations say? This guide looks at five highly relevant topics, how to comply and how the regulation will be enforced.

- ENVIRONMENT PROTECTION
- 2020 SULPHUR CAP
- CLAUSE
- BUNKERS

## The right fuel

As of 1 January 2020, all ships are required to burn fuel with a sulphur content of no more than 0.50% (Regulation 14.1.3, MARPOL Annex VI) unless fitted with an exhaust gas emissions cleaner (scrubber) capable of reducing sulphur emissions to 0.50% or less (Regulation 4, MARPOL Annex VI). Regulation 4 also allows for the use of alternative fuels. This means that before midnight on 31 December 2019, ships must take on board enough 0.50% fuel to be able to reach their next bunkering port after the new regulation comes into force.

## The carriage ban

Apart from ships that have scrubbers, all other ships that have “residual” fuel with a sulphur content higher than 0.50% on board will have to remove it. A total ban on the carriage of residual fuel with a sulphur content higher than 0.50% (excluding ships operating scrubbers) will come into force on 1 March. After this date port state control may check ships’ bunker tanks for non-compliant fuel.

## The scrubbers

Scrubbers are permitted by Regulation 4 of MARPOL Annex VI, Scrubbers are permitted by Regulation 4 of MARPOL Annex VI that deals with equivalents and allows alternative options of meeting the sulphur emissions. Three main designs are available: open, closed and hybrid. Open loop scrubbers use and discharge seawater as part of the scrubber process and their use may be restricted in some waters. This means that a ship will need to carry a stock of compliant 0.50% fuel when the scrubber cannot be used.

## The enforcement

The 2020 global cap will apply to all ships flying the flag of a state that has ratified MARPOL Annex VI and/or calling at a port or passing through the waters of a state that has ratified the Convention. In real terms this means that the Sulphur cap will apply to 96% of the world’s fleet. How the cap will be enforced will vary from jurisdiction to jurisdiction and it will be left to each port state to determine the level of fines imposed and if ships will be detained. Ships operating scrubbers should monitor and maintain a log of exhaust emissions. A failure to properly maintain the log or make false entries is likely to be considered a non-compliance by port state control and other authorities, even if exhaust emission levels are within limits. After the ban on ships carrying fuel with a sulphur content greater than 0.50% comes into force in 2020, port state control may survey bunker tanks to check compliance.

## What to keep in mind

Developing a ship-specific implementation plan is necessary to prepare for 1 January 2020. Such a plan should cover issues such as

- › Having a minimum quantity of 0.50% fuel on board by the end of December 2019
- › Fuel management on board the ship – co-mingling, compatibility and separation
- › Availability of compliant fuel
- › Tank cleaning after switching to new fuels
- › De-bunkering of non-compliant and residual fuel before the carriage ban
- › Monitoring and logging emissions
- › Charter party issues