

MTCC

A PORT STATE PERSPECTIVE ON  
THE NECESSARY ELEMENTS  
FOR EFFECTIVE SULPHUR CAP  
INSPECTIONS



MARITIME AUTHORITY  
OF JAMAICA



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## A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ Jamaica is a member of the CMOU on PSC
- ▶ All Jamaican PSCO have been trained on MARPOL Annex VI
- ▶ Since 2019 CMOU's "Letter of Information" has been circulated to vessels calling at Jamaican ports informing them of IMO's Sulphur Cap 2020
- ▶ Jamaica has ratified MARPOL Annex VI
- ▶ Jamaica is a growing Bunkering location
- ▶ All Bunker Suppliers supply low sulphur fuel

## A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ A robust and consistent approach to compliance is expected by all Port State Control (PSC) regimes
- ▶ PSC inspections will be carried out in accordance with the IMO PSC procedures, the 2019 guidelines for PSC under MARPOL Annex VI

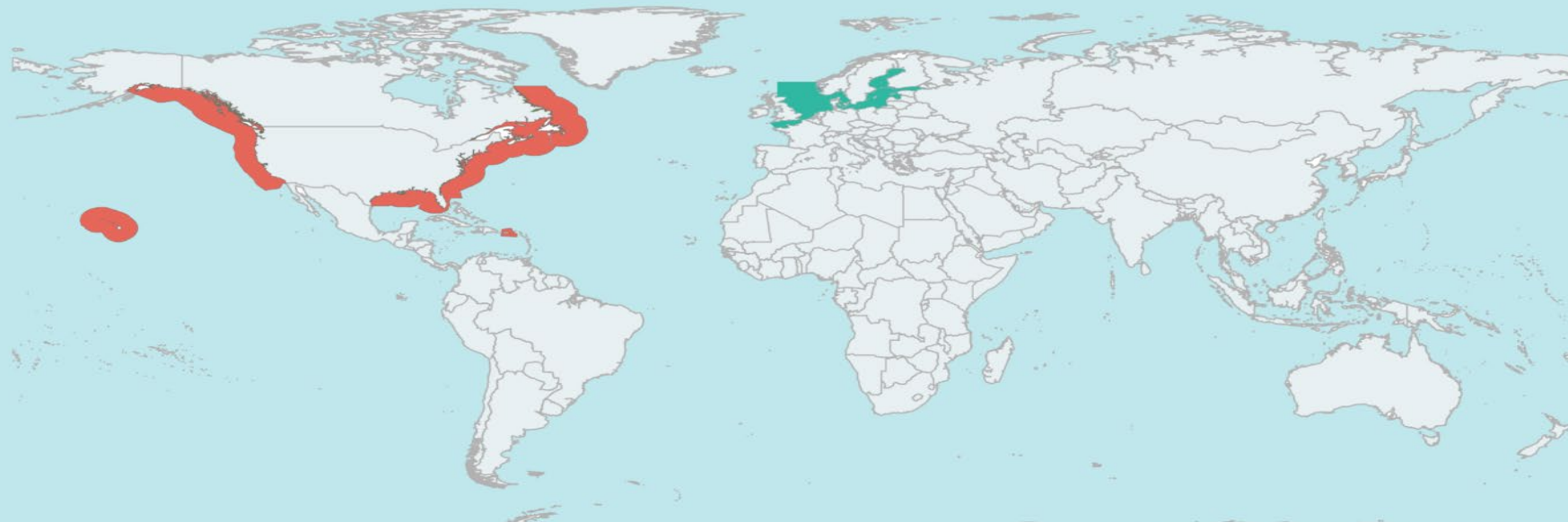
# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

## The requirements:

- ▶ IMO global fuel sulphur limit of 0.50% entered into force January 2020
- ▶ In addition there is a 0.10% sulphur limit in the North American, US Caribbean, North Sea and Baltic Sulphur Emission Control Areas (SECAs)
- ▶ In accordance with ISO 4259-2: 2017, and allowing for a 95% confidence limit, the maximum amount of sulphur allowed in these samples is 0.11% m/m for ECA fuel and 0.53% m/m for global fuel
- ▶ Vessels that have exhaust gas cleaning systems installed are still allowed to use high-sulphur fuel oil (HSFO)

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

## The IMO's emission control areas



North America sulphur oxides and nitrogen oxides SECA



North Sea and Baltic Sulphur oxides SECA

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ The 2019 IMO Guidelines for Port State Control provide guidance on the conduct of PSC inspections for compliance with MARPOL Annex VI and afford consistency
- ▶ The 2019 Guidelines revoke the 2009 Guidelines for port State control under the revised MARPOL Annex VI adopted by resolution MEPC181(59)

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

► Port State Control Officers in conducting inspections, apply:

1. 2019 IMO PSC Guidelines

2. The provisions of MARPOL Annex VI

- i. concerning the prohibition on the carriage of non-compliant fuel oil for combustion purposes for propulsion or operation on board a ship from **1 March 2020**; and
- ii. concerning electronic record books from **1 October 2020**

## A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ If the certificates and documents are valid and appropriate;
- ▶ The overall condition of the ship meets generally accepted international rules and standards;
- ▶ The PSCO's general impressions and observations on board confirm a good standard of maintenance;

The inspection should be considered **satisfactorily concluded.**



## A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ If, however, the PSCO's general impressions or observations on board give clear grounds for believing that the condition of the ship, or its equipment **do not correspond substantially with the particulars of the certificates, or the documents**, the PSCO should proceed to a **more detailed inspection**

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

## ▶ **Additional documentation and procedural requirements during PSC Inspections:**

- International Air Pollution Prevention Certificate (IAPPC)
- Written procedures for fuel change-overs
- Shipboard Implementation Plan
- Tank plans and piping diagrams
- Fuel Oil Non-Availability Report (FONAR)

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ Important Note!!
  - ▶ Fuel Oil Non-Availability Report (FONAR) must be accompanied with all correspondence with flag and the PSC
  - ▶ FONAR should be used only as a last resort and should not be used repeatedly
  - ▶ Condition for approval of FONAR should be strict, repeated applications by a particular operator will attract negative attention

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

## ▶ Additional documentation and procedural requirements during PSC Inspections continued:

- Voyage records: ECDIS and navigation charts
- Oil Record Book Part I - all entries for internal fuel transfers, bunkering, retention, disposal should be entered appropriately and signed
- Engine logbooks
- Tank sounding records
- Equivalent arrangements or alternate fuel

## A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ In a more detailed inspection the PSCO will verify the Bunker Delivery Note (BDN) and the sample;
- ▶ The fuel that is delivered on board for combustion purposes should be recorded by means of a BDN. The BDN should be accompanied by a Representative Sample (MARPOL Sample) of the fuel delivered;
- ▶ The Representative Sample is retained on board until the fuel has been consumed or for at least 12 months;
- ▶ BDN should be kept onboard for at least 3 years;

# A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

## Bunker Delivery Note

MARPOL Annex VI requires that the following information be included in the bunker delivery note provided to the receiving ship. There is no specific format for a bunker delivery note. Bunker suppliers may therefore use their own stationery provided that all the required information is included.

Name and IMO number of receiving ship	
Port	
Date of commencement of delivery	
Name, address and telephone number of marine fuel oil supplier	

Product name(s)	Quantity (metric tons)	Density at 15°C (kg/m <sup>3</sup> ) Fuel oil should be tested in accordance with ISO 3675 or ISO 12185	Sulphur content (% m/m) Fuel oil should be tested in accordance with ISO 8754

### Declaration

I, the fuel oil supplier's representative hereby declare that the fuel oil supplied is in conformity with regulation 14(1) or (4)(a) and regulation 18(1) of MARPOL Annex VI.

Name	Signature	Date
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## A Port State Perspective - IMO 2020 Sulphur Cap Inspections:

- ▶ In situations where the Commercial Samples (taken during bunkering) indicate a higher sulphur content than noted on the BDN, then the flag Administration and PSC at destination need to be notified in writing without delay
- ▶ In Jamaica, since January 2020 we have seen no vessels with non-compliant fuel



Thank You