

National implementation of IMO 2020 and the Med SOx ECA

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Regional Workshop on the consistent implementation of IMO 2020 under MARPOL Annex VI and the 0.10% sulphur limit in the Med SOx ECA (Malta, 22-23 May 2024)



Mediterranean
Action Plan
Barcelona
Convention



INTERNATIONAL
MARITIME
ORGANIZATION

MINISTRIES AND AUTHORITIES INVOLVED

Ministry of Government Administration
Ministry of Health Welfare
Ministry of Finance and Economy
Ministry of Environment
Ministry of Culture and Tourism
Ministry of Science and Technology
Ministry of Commerce, Industry and
Ministry of Planning and Budget
Ministry of Construction and Transport
Ministry of Labor
Ministry of Justice
Ministry of Maritime Affairs and Fisheries
Ministry of Foreign Affairs and Trade

Maritime Authority
or Ministry of
Transport

- Coordination

Legal Department
or Ministry of
Justice

- Legislation
- Penalties for non/compliance

Ministry of Foreign
Affairs

- Ratification and formal representation

Enforcement
authorities

- Inspections
- Issuance of certificates
- Penalties of non compliance

Other Authorities

LEGAL CONSIDERATIONS FOR INCORPORATION

Differences in incorporation
based on legal systems

Need for enabling legislation
for significant policy changes

Placement of detailed
technical matters in
subordinate legislation



LEGISLATION and REGULATIONS



How can we incorporate provisions in national legislation

Does existing legislation support the implementation and the enforcement

Which provisions do we regulate in legislation?

- New policy
- Significant change
- Provisions creating offences which impose criminal offences

Which regulations do we regulate in underlying regulations

- Detailed technical matter
- Subject to change on a frequent basis



SHIP EMISSIONS TOOLKIT GUIDE NO.2



Detailed analysis of domestic legislation



Developed under the GEF-UNDP-IMO GloMEEP Project



Provides guidance for incorporating MARPOL Annex VI

Relevant IMO Resolutions



- .1 MEPC.362(79): Amendments to MARPOL Annex VI (Regional reception facilities within Arctic waters, information to be included in the bunker delivery note (BDN) and information to be submitted to the IMO Ship Fuel Oil Consumption database);
- .2 MEPC.361(79): Amendments to MARPOL Annex VI (Mediterranean Sea Emission Control Area for Sulphur Oxides and Particulate Matter);
- .3 MEPC.340(77) and its corrigendum : 2021 Guidelines for exhaust gas cleaning systems (2021 EGCS Guidelines);
- .4 MEPC.328(76): Amendments to MARPOL Annex VI (2021 Revised MARPOL Annex VI);
- .5 MEPC.326(75): 2020 Guidelines for monitoring the worldwide average sulphur content of fuel oils supplied for use on board ships;
- .6 MEPC.321(74) and its corrigendum : 2019 Guidelines for port State control under MARPOL Annex VI Chapter 3 (2019 PSC Guidelines);
- .7 MEPC.320(74) and its corrigendum : 2019 Guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI;
- .8 MEPC.305(73): Prohibition on the carriage of non-compliant fuel oil for combustion purposes for propulsion or operation on board a ship;
- .9 MEPC.182(59): 2009 Guidelines for the sampling of fuel oil for determination of compliance with the revised MARPOL Annex VI; and
- .10 A. 1155(32): Procedures for port State control, 2021.

IMO CIRCULARS



Disseminate
information



Provide
guidance



Communicate
decisions

- .1 MEPC.1/Circ.889: 2020 Guidelines for on board sampling of fuel oil intended to be used or carried for use on board a ship;
- .2 MEPC.1/Circ.883/Rev.1: Guidance on indication of ongoing compliance in the case of the failure of a single monitoring instrument, and recommended actions to take if the exhaust gas cleaning system (EGCS) fails to meet the provisions of the EGCS Guidelines;
- .3 MEPC.1/Circ.882: Early application of the verification procedures for a MARPOL Annex VI fuel oil sample (regulation 18.8.2 or regulation 14.8);
- .4 MEPC.1/Circ.881: Guidance for port State control on contingency measures for addressing non-compliant fuel oil;
- .5 MEPC.1/Circ.878: Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% sulphur limit under MARPOL Annex VI;
- .6 MEPC.1/Circ.875: Guidance on best practice for fuel oil purchasers/users for assuring the quality of fuel oil used on board ships;
- .7 MEPC.1/Circ.875/Add.1: Guidance on best practice for fuel oil suppliers for assuring the quality of fuel oil delivered to ships;
- .8 MEPC.1/Circ.864/Rev.1: 2019 Guidelines for on board sampling for the verification of the sulphur content of the fuel oil used on board ships; and
- .9 MEPC.1/Circ.795/Rev.8: Unified interpretations to MARPOL Annex VI; and
- .10 MSC-MEPC.5/Circ.15: Delivery of compliant fuel oil by suppliers

ENFORCEMENT MECHANISMS

Inspection of port
state authorities

Flag state survey
and issuance of
certificates of
compliance

Penalties of non
compliance

PENALTIES OF NON-COMPLIANCE

Fines

Suspension of licenses

Legal action, depending on severity of violation

Reporting non-compliance to the IMO's Global Integrated Shipping Information System (GISIS)

Detaining of ships



SURVEYS OF SHIPS



Surveys of ships as regards the enforcement of the provisions of this Annex shall be carried out by officers of the Administration.

The Administration may, however, entrust the surveys either to surveyors nominated for the purpose

Such organisations shall comply with the guidelines adopted by the IMO.

REGULATIONS FOR MONITORING

Regulations for monitoring and reporting on fuel: 2019 Guidelines for consistent implementation of the 0.50% sulphur limit

The same regulations are valid for the 0.10% m/m sulphur limit in the Med SOx ECA.

However, extra attention:

the 0.10% m/m sulphur limit is stricter than the 0.50% m/m global sulphur limit

more fuel switching or starting up alternative technologies



SAMPLING AND TESTING FUEL OILS

Sampling of fuel oils in bunker barges or shore bunker terminals can be taken and tested in the same manner that the MARPOL delivered fuel oils are tested by the PSC.



All possible efforts should be made to avoid a ship being unduly detained or delayed.



If a sample is analysed, sample analysis of fuel oils should not unduly delay the operation, movement or departure of the ship.



CORRECTIVE MEASURES FOR NON-COMPLIANCE

Actions against
non-compliant
suppliers

Reporting non-
compliance to
IMO

Publication of
information on
non-compliant
suppliers





REPORTING NON- COMPLIANCE TO IMO GISIS



Deterrent effect of
publishing non-compliance
information

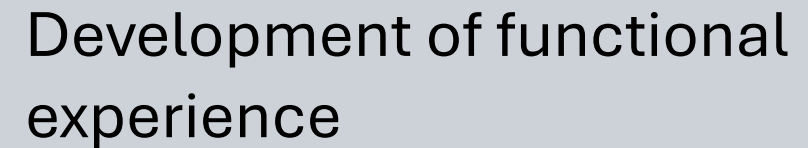
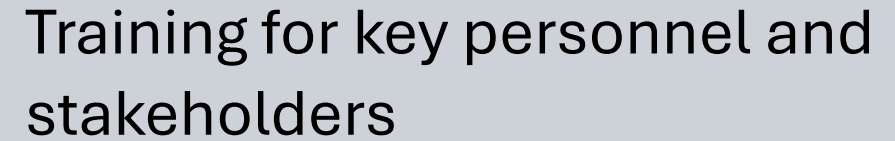
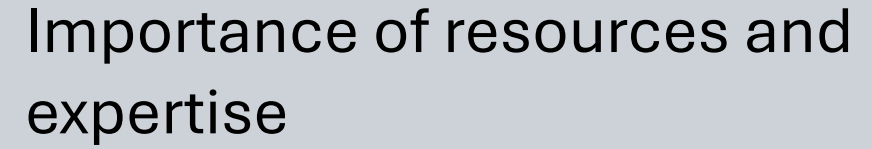
Port States must also
report the detention of
ships. This may affect the
future PSC targeting of
ships

ESTABLISHMENT OF LIST OF SUPPLIERS

List of suppliers is
obligation Regulation 18

Identification of non-
compliant suppliers

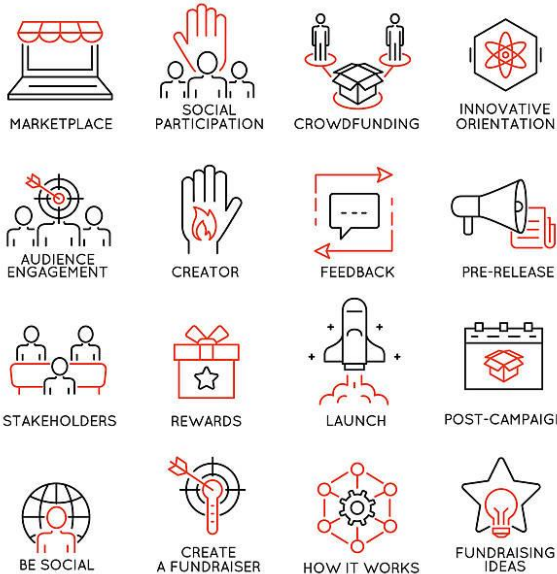
Not intended for identifying
approved suppliers

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STAKEHOLDER AND PUBLIC AWARENESS



Raise public awareness about the importance of complying with MARPOL Annex VI and its sulphur regulations



Stakeholder engagement activities

consulting with ports,
shipowners, shipbuilding
industry, environmental
groups and other
stakeholders

Training programs

Simulation exercises

Incentives and recognition
mechanisms

TRAINING SESSIONS



Provide

Training sessions can provide stakeholders with detailed information about compliance requirements, regulations, and best practices.

Cover

These sessions can cover various topics such as the required regulations, fuel standards, emission monitoring, reporting procedures, and enforcement mechanisms.

Enhance

Hands-on training, case studies, and interactive workshops can enhance understanding and encourage active participation.

STAKEHOLDER ENGAGEMENT



Utilise diverse
communication channels is
essential



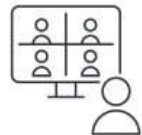
traditional methods such as
workshops, seminars, and
conferences



STREAM



BROADCAST



ONLINE MEETING



PODCAST



CAMERA



CONFERENCE



CHAT



WEBINAR



modern approaches like
webinars, online forums and
social media.

LEARNING FROM OTHER ECAs



Stakeholder engagement

Participation in regional
and international fora

Participation with
stakeholders

INTERNATIONAL COOPERATION FOR SUCCESSFUL IMPLEMENTATION



Cooperation with other CPs and international organizations supports national implementation of MARPOL Annex VI.

CPs engage in information sharing and technical assistance.

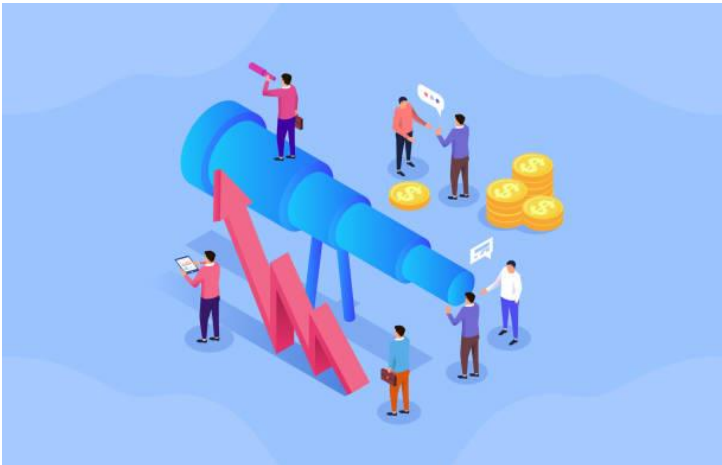
Participation in regional or international fora enables CPs to exchange experiences, coordinate actions, and harmonize approaches to implementation.

RESEARCH AND DEVELOPMENT EFFORTS

CPs encourage and support research and development efforts aimed at advancing technologies for reducing air emissions from ships.

Collaboration with academic institutions and research organizations helps fund and promote innovative solutions for sustainable maritime transportation.

Activity 1.4.2 of the Programme of Work and Budget of the Mediterranean Action Plan (MAP) can facilitate joint enforcement efforts to address common challenges and promote best practices.



NATIONAL DOMESTIC LEGISLATION

Do you have
questions?
Are you ready?

