

Technical Notice

TD **10014/2020**

Dated: 10.02.2020

SUBJECT:

Sulphur Cap 2020

HSFO carriage ban will be effective from 1 March 2020.

From **1 March 2020**, high-sulphur fuel oil (HSFO) cannot be carried in the fuel oil tanks unless the vessel is fitted with an approved equivalent arrangement.

The so-called "**carriage ban**" meaning that unless you have an exhaust gas cleaning system (EGCS), the ship is not allowed to carry any fuel exceeding 0.50% sulphur in the fuel tanks.

While the new sulphur limit took effect on 1 January, the carriage ban will be effective from 1 March 2020.

As part of the MARPOL amendments, the standard **format of the IAPP** certificate will also **change** from 1 March. A new tick-off box with the following text will be included in the supplement: *For a ship without an equivalent arrangement approved in accordance with regulation 4.1 as listed in paragraph 2.6, the sulphur content of fuel oil carried for use on board the ship shall not exceed 0.50% m/m as documented by bunker delivery notes.*

The **IAPP certificate is required to be re-issued in the new format no later than the first IAPP survey after 1 March**, being the annual, intermediate or renewal survey. If, for other reasons, the certificate is to be re-issued after this date, it will be in the new format.

With the carriage ban in place, **PSC will have the opportunity to sample and verify** the sulphur content of fuel carried for use to verify compliance with the new sulphur limit.

When verifying the sulphur content of samples taken on board, as opposed to the MARPOL sample taken during bunkering, a 95% confidence interval has been given. This means that a sulphur content of up to 0.53% may be accepted as compliant when testing such samples. This is to ensure that ships are not unjustly penalized for marginal excess in sulphur content beyond their control. (MEPC.1/Circ.882).

For vessels without any approved equivalent arrangements in place, in case of any remaining HSFO from before 1 January, this needs to be dealt with before 1 March. In case **removing the fuel in time isn't feasible, flag and ports state should be contacted** to agree on contingency measures (ref. MEPC.1/Circ.881).