

## Technical Notice

# TD 9732/2018

Dated: 04.12.2018

### SUBJECT:

**Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% Sulphur limit under MARPOL ANNEX VI**

### Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% Sulphur limit under MARPOL ANNEX VI

MEPC 70 agreed to "1 January 2020" as the effective date of implementation for ships to comply with global 0.50% m/m sulphur content of fuel oil requirement and adopted resolution MEPC.280(70) on the *Effective date of implementation of the fuel oil standard in regulation 14.1.3 of MARPOL Annex VI*. The guidance is part of a set of guidelines being developed by IMO for consistent implementation of the MARPOL regulation coming into effect from 1 January 2020.

In this context, MEPC 73 agreed that Administrations should encourage ships flying their flag to develop implementation plans, outlining how the ship may prepare in order to comply with the required sulphur content limit of 0.50% by 1 January 2020. The plan could be complemented with a record of actions taken by the ship in order to be compliant by the applicable date.

Regulation 18.2.3 of MARPOL Annex VI requires a Party to take into account all relevant circumstances and the evidence presented to determine the action to take, including not taking control measures. Administrations and port State control authorities may take into account the implementation plan when verifying compliance with the 0.50% sulphur limit requirement.

A ship implementation plan is **not a mandatory requirement**. A lack of a ship implementation plan or an incomplete ship implementation plan should **not** be considered as "clear grounds" for a more detailed inspection.

#### Ship implementation plan for the consistent implementation of 0.50% sulphur limit under MARPOL Annex VI

The ship implementation plan for 2020 could cover various items relevant for the specific ship, including, as appropriate, but not limited to:

1. risk assessment and mitigation plan (impact of new fuels);
2. fuel oil system modifications and tank cleaning (if needed);
3. fuel oil capacity and segregation capability;
4. procurement of compliant fuel;
5. fuel oil changeover plan (conventional residual fuel oils to 0.50% sulphur compliant fuel oil); and
6. documentation and reporting.