
January 2014

Statutory Information: MARPOL Annex VI

Applicability: All shipowners, operators, and charterers

One of the major step changes within MARPOL Annex VI occurs on 1 January 2015 when the ECA-SO_x* fuel oil sulphur limit reduces from 1.00 % to 0.10 %.

This will therefore directly affect all ships which comply with the ECA-SO_x requirements on the basis of the sulphur content of the fuel oil as bunkered. From that date any fuel oil onboard which exceeds 0.10 % sulphur will only be suitable for use outside the various ECA-SO_x.

Consequently, those shipowners and operators affected by this change will need to plan accordingly:

- Charter party bunker clauses or bunker nominations will need to be duly changed. Shipowners and operators should schedule that change sufficiently in advance of 1 January 2015 in order to avoid, or at least limit the quantity of, 1.00 % maximum sulphur fuel oil remaining onboard at that date.
- FOBAS experience shows that these 0.10% maximum sulphur fuel oils will generally be supplied with no more than a very tight margin below the required limit value. Therefore it will be essential, in order to remain compliant in terms of the fuel oil as actually used, to ensure adequate cleaning of loading, storage, transfer and treatment systems which have previously handled higher sulphur content residual or distillate fuel oils prior to being used for fuel oils supplied to a 0.10 % maximum sulphur content.
- As this 0.10 % maximum sulphur fuel oil is expected to be distillate, the optimum change-over connection in the fuel oil service system will generally be just prior to the point of use in order to reduce to a minimum its mixing with the higher sulphur fuel oils as used outside ECA-SO_x. Attention will also be necessary to ensuring that the arrangement and operation of any spill back connections does not compromise otherwise compliant 0.10 % maximum sulphur fuel oils in service tanks.
- For ships operating inside, or about to enter, ECA-SO_x on 1 January 2015 that there is the required quantity of 0.10 % maximum sulphur fuel oil onboard.
- For ships inside ECA-SO_x that 0.10 % maximum sulphur fuel oil is brought into use no later than 00:00 hrs 1 January 2015 with the change-over from the previous fuel duly recorded in the same manner as on entry into an ECA-SO_x.
- That from 1 January 2015 only 0.10% maximum sulphur fuel oil is in any isolated, unit mounted or free-standing type, fuel tanks on engines (emergency generators, fire pumps, lifeboat engines, compressors, etc.), boilers, incinerators and other combustion machinery which are used inside ECA-SO_x.

The only exception to the above will be for those ships using exhaust gas cleaning systems, approved in accordance with the MEPC.184(59) Guidelines. For such systems, from 1 January 2015, the maximum SO₂/CO₂ ratio while operating inside ECA-SO_x will correspondingly reduce from 43.3 to 4.3.

FOBAS will be issuing further Bulletins on this topic through 2014 however for any further information please feel free to email us at fobas@lr.org or call us - +44 (0) 23 8024 9797 (UK) or +65 6278 9444 (Singapore)

** ECA-SOx – Emission Control Areas established in order to limit emissions of sulphur oxides and particulate matter.*

These are:

- Baltic Sea
- North Sea
- North American
- US Caribbean Sea

As defined in:

Regulation 1.11.2 of MARPOL Annex I
Regulation 1.14.6 of MARPOL Annex V
Appendix VII of MARPOL Annex VI
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