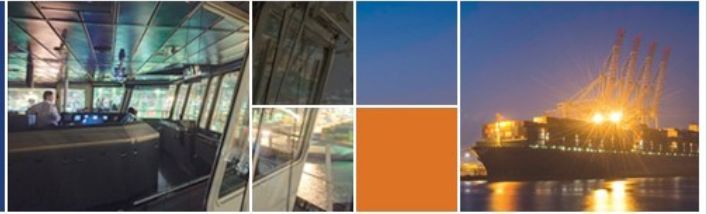




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## Compliance with the 2020 Global Sulphur Cap

September 2018

Updated Oct 2019, Dec 2019, Jan 2020

How will MARPOL Annex VI compliance be determined? This question is considered by reference to the IMO Guidelines, in particular the Guidelines for Port State Control, including inspections, sampling and analysis of fuel oil samples and provides key recommendations to shipowners.

The Sulphur Regulation is now in force. One issue that has come to the Club's attention is a request to an Owner to use non-compliant bunkers due to alleged non-availability of low sulphur fuel against the provision of a **letter of indemnity (LOI)** from a charterer in respect of any adverse consequences.

Members are advised that Videotel have made available **Sulphur 2020 e-learning courses** which may be useful. Published Jan 2020

The latest Risk Alert, *IMO Sulphur 2020 – Fuel Oil Tank Entry*, is available [here](#), published December 2019.

The China Classification Society (CCS) English bulletin discussing key points re implementation of the 2020 global sulphur limit and the McLeans report on Inspections in France are included in the **Sulphur 2020: China & France** article.

The **Scrubber Advisory from MPA for Singapore Registered Ships** article has useful information about installation of systems for compliance with IMO2020 sulphur cap.

Read the '2020: Are you prepared?' article by Charles Brown, outlining the key areas for shipowners consideration in anticipation of the Sulphur 2020 implementation.

The 2020 Global Sulphur Cap – International Chamber of Shipping Guidance

In furtherance of our commitment to keeping our Members informed and to assisting our Members to prepare for the forthcoming Global Sulphur Cap, we provide the following International Chamber of Shipping 'Guidance to Shipping Companies and Crews on Preparing for Compliance with the 2020 'Global Sulphur Cap' for Ship's Fuel Oil in Accordance with MARPOL Annex VI' which was updated on 1 July 2019.

Although Members' planning, and in particular their Ship Implementation Plans, are likely now to be well-advanced, we hope the latest Guidance may nevertheless assist those Members who are still finalising these and their pre-implementation preparations generally.

Sulphur emissions: The clock is ticking. Charles Brown's article gives a useful overview of the issues surrounding the introduction of the Marpol Annex VI Regulation 14.1.3 on 1 January 2020: <https://www.steamshipmutual.com/publications/Articles/MARPOLAVI0818.htm>

Sulphur 2020: Contractual Conundrums. In this article, Heloise Campbell looks at some of the contractual/charter party issues that owners or charterers may face in relation to the Sulphur 2020 regulations coming into force. (Note video presentation also available): <https://www.steamshipmutual.com/publications/Articles/sulphur-2020032019.htm>

Early warning on global 2020 sulphur cap compliance. Read the letter of warning issued by the Paris MoU group: <https://www.steamshipmutual.com/publications/Articles/early-warning-sulphur-2020122018.htm>

AMSA marine notice on global implementation of new sulphur content limit: <https://www.steamshipmutual.com/publications/Articles/am.htm>

Circular L.329 Global Sulphur Cap, June 2019: <https://www.steamshipmutual.com/Circulars-London/L.329.pdf>

Risk Alert 44: Emission Control Areas – Ultra Low Sulphur Fuel Oil Change-over Procedures: [https://www.steamshipmutual.com/downloads/Risk-Alerts/RA44ECA\\_ULSFuelOilChangeoverProceduresDec14.pdf](https://www.steamshipmutual.com/downloads/Risk-Alerts/RA44ECA_ULSFuelOilChangeoverProceduresDec14.pdf)

Sulphur emissions in the Baltic Sea: Two years on July 2017, article by

HFW: <https://www.steamshipmutual.com/publications/Articles/sulphuremissionsbalticsea.htm>



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