



Canadian Fuels
ASSOCIATION



IMO sulphur cap – Consistent implementation

Intersessional meeting, 9-13 July 2018

The **Marine Fuels Platform** members fully support the timely implementation of the 0.50% m/m global sulphur limit on 1 January 2020 and reiterate their call for its consistent and pragmatic implementation.

The IMO will develop a single set of guidelines on "Consistent implementation of regulation 14.1.3 of MARPOL Annex VI" for use by Administrations, port State control authorities, ship owners, shipbuilders and fuel oil providers. With regard to the various points that will be covered the **Marine Fuels Platform** would like to make several recommendations:

1^o) Ship Implementation planning

- A well thought-out ship-specific implementation plan is of utmost importance in ensuring that the compliance with regulation 14.1.3 of MARPOL Annex VI is achieved as smoothly as possible.
- A standard template for developing ship-specific implementation plans would be of benefit to both ship operators and Administrations.
- Ship-owners and operators could submit these plans for review and endorsement by Administrations
- Those ships which are not in possession of an implementation plan supplemented by a detailed record of how the plan was followed, should be subject to more detailed inspections in order to verify that the sulphur content of the fuel oil used on board the ship meets the requirement of regulation 14.1.3.

2^o) The impact on fuel and machinery systems

- A suitable industry guidance that addresses the impact on fuel and machinery systems resulting from new fuel blends or fuel types, and provides guidance on the handling, storage and use of such fuels would be very helpful.

3^o) Verification issues and control mechanism and actions

- A uniform approach to fuel oil testing and reporting protocol for verification of compliance should be put in place
- All tests undertaken on fuel oil samples for verifying compliance should be done by accredited laboratories using the same test method and reporting protocol.

- To determine compliance with the sulphur limits, the final and binding analysis should be carried out in accordance with the appropriate ISO (e.g. 8754:2003) by a laboratory that is fully accredited for the purpose of conducting the tests in accordance with ISO 17025 or an equivalent standard.
- Consistent with practices in other fuel markets, the 95% confidence limits in accordance to the ISO 4259 should be considered to determine compliance of all fuel samples with the sulphur limits

4°) Fuel oil non-availability

- In order to assure a consistent implementation of the Sulphur cap and in view of facilitating a global compliance in a transparent manner, an effective reporting system for fuel oil non availability should be uniformly applied. In particular, ships that unsuccessfully attempted to be supplied with compliant fuel should file their cases supported by unequivocal justification. As an example, the MFP supports the extension of the use of the FONAR system. FONAR is not a waiver, but a documentation of the circumstances of non-compliance with the IMO fuel sulphur regulation.
- Clear guidance should be developed to deal with any remaining non-compliant fuel following a non-availability situation and re-fueling with compliant fuel at a next port.
- Clear guidance should be provided for quality issues that could potentially lead to “non-availability of compatible Marine Fuel”.

5°) Safety implications related to blending fuels

- The Ship Implementation Plans are the right tool to identify any ship specific safety risks related to 0.50% sulphur fuel and develop an appropriate action plan for the ship operator to address and mitigate the concerns identified
- Where ships may alternate between using distillate fuels and heavier fuels, clear procedures for storing and segregating different types of fuel and for transitioning from one type of fuel to another may be needed
- General industry initiatives related to potential implementation issues are underway (e.g. [IPIECA](#) and [Concawe](#) have engaged with [ISO](#), [CIMAC](#) and the [Energy Institute](#) to support work on development of improved testing methods for stability and compatibility. It is anticipated that this work will ultimately lead to the issuing of guidelines for marine fuels handling to prevent stability and compatibility issue)
- IPIECA has engaged with stakeholders and plans to hold a number of stakeholder workshops worldwide to discuss potential fuel-related issues and related fuel handling recommendations

6°) Port state control & fuel quality guidelines

- Guidelines with clear procedure for the port states (initial inspections, cases for more detailed inspections, detainable deficiencies) are needed.
A centralised global system for sharing of information, data recording or alerts on non-compliances and violation of environmental requirements among different authorities and different Port States Control Memorandum of Understanding regimes involved in emission controls should be encouraged.

About us: The main scope of the platform would be to underline the importance of a consistent and effective implementation of IMO's decision in all regions of the world.

Global compliance with IMO's decision on the implementation of a global sulphur limit in marine fuels is needed to avoid competitive distortions that may result from uneven implementation of the global sulphur cap. In addition, A platform amongst associations supplying marine fuel to the market is an adequate way to create awareness and to address advocacy messages to the issue in the different parts of the world.

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Note: Full members of the platform: [AFPM](#), [API](#), [ARA](#), [Canadian Fuels Association](#), [FuelsEurope](#), [IIEE](#), [Sapia](#). Supporting members of the platform: [Concawe](#), [IPIECA](#), [JPEC](#).