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14 August 2018

To: Ship Owners, Ship Managers and Ship Masters

Dear Sir/Madam,

Concentrated Inspection Campaign on MARPOL Annex VI
From 1 September to 30 November 2018
In Tokyo and Paris MOU regions

The Tokyo Memorandum of Understanding (Tokyo MOU) region in conjunction with the Paris Memorandum of Understanding (Paris MOU) region will launch a Concentrated Inspection Campaign (CIC) on MARPOL Annex VI from 1 September 2018 to 30 November 2018.

The purpose of this CIC is to substantiate the level of compliance with MARPOL Annex VI within the industry and to increase awareness amongst ship crews and ship owners about the importance of prevention of air pollution.

The CIC will be conducted in conjunction with regular port state control inspections. Each ship will be subjected to the CIC inspection only once during the campaign. Non-compliance with the issues highlighted in the CIC will lead to the issuance of deficiencies and in severe cases, detention of the vessel. The results of the campaign will be analysed and findings will be presented to the governing bodies of the MOUs for submission to the IMO.

Port State Control Officers (PSCOs) will use a list of 11 questions to assure that equipment carried onboard complies with the relevant statutory certificates, the master and officers are qualified and familiar with operations and that equipment is properly maintained and functioning.

In order to facilitate the masters, managers and owners of Hong Kong registered vessels in preparation for the upcoming CIC, the Marine Department has issued the (Guidance to HK Ships Preparing for the Concentrated Inspection Campaign on MARPOL Annex VI) in Annex 1. You are advised to distribute this circular letter and the guidance to your respective vessels and make sure that all the shipboard staffs are fully aware of the campaign.

During the inspection, the PSC officer will utilize a questionnaire to verify if the ship will comply with the requirements. The questionnaire has been published on the website (<http://www.tokyo-mou.org>) of the Tokyo MOU.

Should you have any queries, please contact Senior Surveyor of the Cargo Ships Safety Section as follows:

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Yours faithfully,

No signature on website copy

(C.L. FONG)

Senior Surveyor of Ships / Cargo Ships Safety Section
for Director of Marine

Encl.: Annex 1

**Guidance to HK Ships Preparing for
the Concentrated Inspection Campaign on MARPOL Annex VI
(Period from 1 September to 30 November 2018)**

Introduction

Air pollution from ships contributes to overall air quality problems in many areas and affects the natural environment. Pollution by sulphur and nitrogen oxides in fuel contributes to acid rain, increased eutrophication and reduced air quality.

Following international cooperation in the combat against acid rain and ozone-depleting substances, the IMO, through the MEPC, included the issue of air pollution in its work programme. As a result of the work, through the Protocol of 1997, Annex VI was included in the MARPOL Convention. MARPOL Annex VI sets limits on sulphur- and nitrogen oxide emissions from ship exhausts and prohibits deliberate emissions of ozone-depleting substances and volatile organic compounds. With the increasing concerns of greenhouse gas emissions, the IMO has expanded the context of Annex VI to encompass the energy efficiency of vessels in.

MARPOL Annex VI is rapidly progressing and evolving; it is the aim of this CIC to enhance the awareness of the shipping industry to this annex and to prepare for the foreseen changes to come.

References

- MARPOL Annex VI, as amended
- MEPC.184(59) Guidelines for exhaust gas cleaning systems
- MEPC.181(59) Guidelines for port state control.
- MEPC.185(59) Guidelines for the development of a VOC management plan.

CIC questions and guidance for crew's preparation

Q 1 - Are bunker delivery notes, with details of fuel oil for combustion purposes, kept available on board for the required period of 3 years?

On ships of 400 gross tonnage and above, and on fixed or floating drilling rigs and other platforms, bunker delivery notes for fuel used for combustion purposes shall be kept on board.

The Master should check/ensure that:

- Bunker delivery notes from the past three years have been correctly filled in and are below the limit (MARPOL Annex VI, regulation 18.7.1).
- The sulphur content of any fuel oil used on board ships must not exceed 3.50% m/m. For ships operating within an emission control area, the sulphur content of fuel oil used on board ships must not exceed 0.10% m/m.
- The administration and the competent authority of the relevant port of destination must be notified when compliant fuel cannot be purchased. The ship must be able to provide evidence that it attempted to purchase compliant fuel oil in accordance with its voyage plan and, if it was not made available where planned, that attempts were made to locate alternative sources for fuel oil and that, despite best efforts to obtain compliant fuel oil, no such fuel oil was made available for purchase.

Q 2 - Do bunker delivery notes indicate that fuel oils delivered and used on board is not exceeding the maximum allowed sulphur content, as appropriate?

The Master and chief engineer should verify:

- Whether the quality of fuel oil used on board the ship has a sulphur content of or below 3.50% m/m (MARPOL Annex VI, regulation 14.1.2) or 0.10 % m/m depending on the sailing area.
- Correspondence between the bunker delivery notes and the ship's Oil Record Book in accordance with MARPOL Annex I (MARPOL Annex I, regulations 17.2.5 and 17.4).

Note: Ship may be considered for detention if there is a severe and systemic breach of this regulation.

Q 3 - Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.10% m/m in fuel oil while operating in SO_x emission control areas, have a written procedure showing how fuel oil change-over is to be done for achieving compliance with the above requirements when entering SO_x emission control areas?

The Master should ensure that the ship when entering or leaving an Emission Control Area and using separate fuel oils to comply with the sulphur limits of fuel oil in an ECA, must have a written procedure showing how the fuel change-over is to be done. Language of the procedure must be in the working language of the vessel.

Q 4 - Are alternative arrangements, (e.g. scrubbers) installed on board according to regulation 4.1 approved by the flag State?

The Master should ensure that:

- If an alternate arrangement is installed, it has been approved by the Administration to be equivalent to the standards in MARPOL Annex VI, regulations 13 and 14 (MARPOL Annex VI, regulation 4.1).
- Such an alternative arrangement has been communicated to the Organization/IMO (MARPOL Annex VI, regulation 4.2).
- Such an alternative arrangement has functioned effectively.

For a ship fitted with an exhaust gas cleaning systems (EGCS), the record of measurement of SO₂ (ppm)/CO₂ (% v/v) of exhaust gas from the EGCS should not exceed the following ratio in accordance with the 2015 Guidelines for exhaust gas cleaning systems (MEPC.259(68)):

- 1) for ships engaged in voyages within ECA: SO₂/CO₂ ≤ 4.3; or
- 2) for ships not engaged in voyages within ECA: SO₂/CO₂ ≤ 151.7

Q 5 - Do ships which are using separate fuel oils to comply with the maximum sulphur content of 0.1% m/m in fuel oil and entering or leaving SO_x emission control areas, record detailed information showing that the ship has completed/initiated the change-over in the logbook prescribed by the Administration?

The Master should check that:

- The recorded information related to the change-over of fuel is complete.
- The recorded dates, times and ship's positions match the information to be found in the deck and/or engine room logbooks.
- The volumes of low sulphur fuel oils recorded at entering and exiting the ECA match the consumption figures of fuel oil as recorded in the engine room logbooks or other relevant documents (i.e. the recorded amount of fuel in the tanks at exit of the ECA or at arrival at the port minus the recorded amount of fuel in the tanks at entry of the ECA should match the (estimated) fuel consumption of the vessel).

Q 6 - Do ships which have rechargeable systems containing ozone-depleting substances (refer to the supplement to the IAPP Certificate, item 2.1), have the ozone-depleting substances record book maintained?

The Master should ensure that:

- the ship has an ozone-depleting substances record book (MARPOL Annex VI, regulation VI/12.6).
- there are effectively implemented maintenance procedures for the equipment containing ozone-depleting substances.
- the officers and crew are familiar with the procedures to prevent emissions of ozone-depleting substances.
- there are no deliberate emissions of ozone-depleting substances.

Q 7 - Where an Approved Method in accordance with Annex VI, regulations 13.7.1-13.7.5 (refer to the supplement to the IAPP Certificate, item 2.2.1) is installed, has such an installation been confirmed by a survey using the verification procedure specified in the Approved Method File, including appropriate notation on the ship's International Air Pollution Prevention Certificate of the presence of the Approved Method?

This only applies to ships constructed on or after 1 January 1990 but prior to 1 January 2000

The Master should check that:

- diesel engines, with a power output of :
 - more than 5,000 kW AND;
 - a per cylinder displacement at or above 90 litres;have an Approved Method installed and it has been surveyed and included in the IAPP certificate.

Q 8 - For ships equipped with a shipboard incinerator or thermal waste treatment device installed as an alternative arrangement, is the ship's crew responsible for the operation of the equipment familiar with, properly trained in, and capable of implementing the guidance provided in the manufacturer's operating manual?

The Master should ensure that:

- the crew and officers responsible for the operation of the incinerator are familiar with the guidance and instructions given by the manufacturer.

Q 9 - Are the master and crew familiar with essential shipboard procedures in the approved VOC Management Plan relating to the prevention of air pollution from ships?

This only applies to crude oil tankers.

The Master should ensure that all related officers and crew members are familiar with essential shipboard procedures in the approved VOC Management Plan. The person responsible for the VOC management onboard, and the implementation of the plan, should be fully conversant with the content of the plan. Other crew members responsible for cargo operations or COW operations should be familiar with the procedures in the plan.

Q 10 - Does the ship keep on board a Ship Energy Efficiency Management Plan (SEEMP)?

Marpol Annex VI Regulation 22 requires that each ship of 400 gross tonnage and above shall keep on board a ship specific Ship Energy Efficiency Management Plan (SEEMP). This may form part of the ship's Safety Management System (SMS).

The Master should ensure the general availability of the SEEMP and ensure the plan is readily available for inspection.