



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

Subject: News Flash of ISWG-AP 1

The Intersessional Meeting on Consistent Implementation of regulation 14.1.3 of MARPOL Annex VI, ISWG-AP 1 held its first session at IMO HQ in London from 9th to 13th July 2018. In this regard, please be informed of the main issues and summary of ISWG-AP 1 as below.

Terms of Reference for the Intersessional Meeting, as agreed by PPR 5, are as follows;

- .1 develop draft Guidelines for consistent implementation of regulation 14.1.3 of MARPOL Annex VI;
- .2 develop draft amendments to MARPOL Annex VI:
 - .1 definition of "Sulphur content" (amendments to regulation 2); and
 - .2 testing and verification procedure of in-use fuel oil samples;
- .3 develop draft amendments to the following existing Guidelines:
 - .1 2009 Guidelines for PSC under MARPOL Annex VI (res. MEPC.181(59));
 - .2 2010 Guidelines for monitoring the worldwide average Sulphur content of fuel oils supplied for use on board ships (res.MEPC.192(61); and
 - .3 Guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used on board ships (MEPC.1/Circ.864);
- .4 amendments to regulation 14 of MARPOL Annex VI to require a dedicated sampling point for fuel oil:
 - .1 develop draft amendments to regulation 14 of MARPOL Annex VI, using document PPR 5/12 as a basis; and
 - .2 consider the need to develop new guidelines or revise the Guidelines for onboard sampling (MEPC.1/Circ.864); and
- .5 submit a report to PPR 6.



1. Development of draft Guidelines for consistent implementation of regulation 14.1.3 of MARPOL Annex VI (Agenda 2)

(1) Guidance on development of Ship Implementation Plan for 2020

- The meeting agreed that the Ship Implementation Plan(SIP) would not have a mandatory nature and would not need to be endorsed by the Administration. The meeting could not agree on the inclusion of reference to “practical and pragmatic approach by port State control authorities”.
- The meeting finalized the draft MEPC circular on Guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% Sulphur limit under MARPOL Annex VI.
- This guidance consist of introduction, Ship implementation plan for the consistent implementation of 0.50% Sulphur limit under MARPOL Annex VI and issues relating to use of Sulphur compliant fuel oil.
- There are three appendices to this circular:
 - 1) Appendix 1, Indicative example for ship implementation plan;
 - Particular of ships
 - Planning and preparation
 - risk assessment and mitigation plan
 - fuel oil system modification and tank cleaning
 - Fuel oil capacity and segregation capability
 - Procurement of compliant fuel oil
 - Fuel oil changeover plan
 - Documentation and reporting
 - 2) Appendix 2, Additional guidance for impact on machinery systems; and
 - 3) Appendix 3, Additional guidance for tank cleaning.



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

- The circular addresses some safety issue identified with regard to low Sulphur fuel oil, in particular through the section on risk assessment and additional guidance provided on impact on machinery systems and tank cleaning. The meeting also considered the identification of further potential safety implications as follows:
 - Stability of blended fuel oil;
 - Compatibility, including new tests and metrics for future fuel;
 - Cold flow properties;
 - Acid number;
 - Flash point;
 - Ignition quality; and
 - Cat fines.
- **This draft circular on Guidance on the development of a ship implementation plan and the related discussion on safety implications associated with the use of low-Sulphur fuel oil are going to be reported to MEPC 73.**

(2) Guidelines for consistent implementation of regulation 14.1.3 of MARPOL Annex VI

- The meeting considered the development of the draft Guidelines for consistent implementation of regulation 14.1.3 of MARPOL Annex VI, taking into account all documents submitted to this session and relevant document submitted to PPR 5 based on the outline of the guidelines agreed by PPR 5.
- The draft guidelines consist of introduction, Ship implementation planning for 2020, Impact on fuel and machinery systems, Verification issues and control mechanism and actions, Fuel oil non-availability and standard format for reporting fuel oil non-availability.



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

- The main discussion points are as follows:
 - The guidelines should be useful, not just for the implementation by 1 January 2020 but for achieving, maintaining compliance and supporting the work of the parties;
 - The guidance should avoid reiteration of regulation text;
 - "Regulation 14.1.3" will no longer exist when the MARPOL amendments enter into force. Therefore the title changed to "0.50% Sulphur limit"
 - Definitions are needed to be included;
 - The latest version of ISO 8217 specifications addresses the case of renewable marine fuels;
 - There need to be consistency in the language used: "Party" and "Administration";
 - Both authorizations of port State and flag State are required to permit the voyage, especially in the light of regulation 18;
 - The remaining non-compliant fuel oil onboard should be disposed to reception facilities at the first port where such reception facility is available;
 - Guidance on de-bunkering procedures would also be needed for port States and flag States to deal with ships having non-compliant fuel on board; and
 - FONAR should be equally applicable to ECAs and non-ECA.
- **Further discussion would be required at PPR 6 which is scheduled in February 2019 for finalization this guidelines, with a view to submission to MEPC 74.**

2. Development of draft amendments to MARPOL Annex VI (Agenda 3)

- The meeting recalled a proposal in document MEPC 72/5/7(China) on the addition of a definition of "Sulphur content" in regulation of MARPOL Annex



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

VI that would make ISO 8754:2003 or ISO14596:2007 mandatory under MARPOL Annex VI as the test method of Sulphur content of fuel oil.

- This agenda related to "test and verification standard of fuel oil Sulphur content" both for MARPOL fuel and in-use fuel oil. The main discussion points are as follows:
 - Test method : ISO 8754 or ISO 14596;
 - Verification standard : ISO 4259 – 95% confidence level approach; and
 - Different approach for MARPOL fuel and in-use fuel oil : consistent analysis method should be applied
- The meeting discussed and agreed on the following draft amendments:
 - MARPOL Annex VI, regulation 2
 - : the group agreed to develop a draft definition of "Sulphur content" referring to a specific version of ISO 8754 in a footnote.
 - MARPOL Annex VI, regulation 14
 - : the group agreed to develop a draft amendment to regulation 14 for sampling and testing procedure of in-use fuel oil.
 - MARPOL Annex VI, Appendix VI
 - : the group agreed to develop a draft amendment to appendix VI for adding in-use fuel oil sample analysis procedures.
 - : 100% confidence level approach for MARPOL Sample and 95% confidence level approach for in-use fuel oil sample
- **Further discussion would be required at PPR 6 which is scheduled in February 2019 for finalization the MARPOL amendments, with a view to submission to MEPC 74.**

3. Development of draft amendments to the existing Guidelines (Agenda 4)



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

- 2009 Guidelines for PSC under MARPOL Annex VI (res. MEPC.181(59))
 - The group agreed not to consider proposed draft amendment to the 2009 guidelines to the exhaust gas cleaning system because PPR 5 established a CG on EGCS and instructed it to develop consequential amendments to the 2009 guidelines.
 - There were comments that other areas such as relating to NOx provisions should be reviewed, accidental breakdown of EGCS to be included, and the quantity of fuel oil considered sufficient for the intended voyage in an ECA was an operational issue and should not be included.
 - Due to time constraint, the 2009 guidelines could not be completely reviewed and based on consideration and discussion, the meeting developed draft amendments to the 2009 guidelines for port State control under the revised MARPOL Annex VI (Res.MEPC.181.(59)).
- **Further discussion would be required at PPR 6 which is scheduled in February 2019 for finalization the draft amendment to the 2009 guidelines, with a view to submission to MEPC 74.**

4. Amendments to regulation 14 of MARPOL Annex VI to require a dedicated sampling point for fuel oil (Agenda 5)

- The meeting having agreed that the sampling point would be 'designated' instead of 'dedicated' and so amendments developed would refer to 'designated sampling point'.
- The meeting developed draft amendments to regulation 2 and 14 and also agreed that the amendments to the MEPC.1/Circ.864 as follows:
 - MARPOL Annex VI, regulation 2
: a draft definition of "Low-flashpoint fuel"
 - MARPOL Annex VI, regulation 14
: one or more sampling points shall be fitted or designated



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

- : sampling points shall be fitted or designated not later than the first renewal survey after [entry into force date] for existing ships
- : fuel oil system for low-flashpoint fuels are exempted from the sampling points requirement
- MEPC.1/Circ.84
 - : draft amendments to the guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used onboard ships
- **Further discussion would be required at PPR 6 which is scheduled in February 2019 for finalization the MARPOL amendments.**

5. Action requested to further IMO Meetings regarding the results of ISWG-AP 1

- MEPC 73 (Oct 2018) is requested to note and review further for;
 - Draft MEPC circular on guidance on the development of a ship implementation plan for the consistent implementation of the 0.50% Sulphur limit under MAROL Annex VI
 - Safety implementation issues associated with use of low-Sulphur fuel oil
 - It is recommended to invite MSC 100 to consider the outcome of this meeting concerning the safety issues.
- PPR 6 (Feb 2019) is requested to note and review further for;
 - The meeting submitted its outcome concerning the development of SIP for 2020 to MEPC 73
 - Draft guidelines on consistent implementation of the 0.50% Sulphur limit under MARPOL Annex VI
 - Draft amendments to regulation 14 and appendix VI of MARPOL Annex VI
 - Draft amendments to the 2009 guidelines for port State control under the revised MARPOL Annex VI (Res.MEPC.181(59))



Briefings of IMO Meeting

ISWG-AP 1 (9 -13 July 2018)

BRIEFING STATUS

Flash

No. IMO-0009-2018

- Draft amendments to regulation 2 and 14 and draft amendments to the guidelines for onboard sampling (MEPC.1/Circ.84).

- The End -

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