



Briefings of IMO Meeting

PPR 6 (18 - 22 February 2019)

BRIEFING STATUS

Flash

No. IMO-0005-2019

(For sub-committee only 1 step as Flash)

Subject: News Flash of PPR 6 (Sub-Committee on Pollution Prevention and Response)

The Sub-Committee on Pollution Prevention and Response (PPR) held its sixth session at IMO HQ in London from 18th to 22nd Feb. 2019. In this regard, please be informed of the main issues and summary of PPR 6 as below. In reviewing this briefing, readers should be assured that the output written herein are not legally effective until they are adopted as mandatory instruments by MEPC.

1. 2020 0.5% Sulphur limit (Agenda 8, 9) ★

(1) Back Ground

- The MEPC 70 decided that the sulphur content limit for fuel oil in regulation 14.1.3 of MARPOL Annex VI (i.e. 0.50% m/m) should become effective on 1 January 2020.
- The MEPC 71 approved the new output on "Consistent implementation of regulation 14.1.3 of MARPOL Annex VI" in the PPR Sub-Committee's biennial agenda for 2018-2019 with a target completion year of 2019.

(2) Discussion and outcomes

- Amendments to MARPOL Annex VI
 - The Sub-committee agreed with the following draft amendments to MARPOL Annex VI, which will be forwarded to MEPC 74 for further consideration and approval.
 - .1 **(Reg.1)** Application of MARPOL Annex VI
 - .2 **(Reg.2)** Definition of "Sulphur content of Fuel oil", "Low-flashpoint fuel", "MARPOL delivered sample", "in-use sample" and "onboard sample"
 - .3 **(Reg.14)** in-use fuel oil sampling and testing



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- For existing ships, the sampling point(s) shall be fitted or designated not later than the first renewal survey that occurs after entry into force of these amendments or 12 month after, whichever is later.
- .4 **(Reg.18 and Appendix VI)** Fuel Oil Verification
 - MARPOL Delivered FO Sample (Part 1) : Confidence Level 100%
 - In-use and onboard FO Sample (Part 2) : Confidence Level 95%*

*e.g. : Applicable limit(0.5%) / Test margin value(0.53%)
=> met the requirement (0.5% < result ≤ 0.53%)
- .5 **(Form of IAPP Certificate)** New addition of tick boxes for the sampling point
- Guidelines on consistent implementation of the 0.50% Sulphur limit under MARPOL Annex VI
 - Key items
 - .1 Impact on fuel and machinery systems
 - .2 Verification issues and control mechanism and actions
 - .3 Fuel oil non-availability with Form of its report (FONAR, Fuel Oil Non-Availability Report)
 - .4 Possible safety implications relating to fuel oils meeting the 0.50% m/m Sulphur limit
 - The Sub-committee finalized the draft guidelines, excluding the following unconcluded disputes:
 - .1 There are 4 options for disposal of remaining Non-compliant Fuel onboard after use, which will be reconsidered at MEPC 74; and
 - .2 Consideration on which term is more appropriate [MARPOL] in-use sample and onboard sample or ~~[MARPOL]~~ in-use sample and onboard sample, which will be considered whether to delete the term "MARPOL" or not, at MEPC 74.



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- Amendments to the Guidelines for onboard sampling for the verification of the Sulphur content of the fuel oil used onboard ships (MEPC.1/Circ.864)
 - The Sub-Committee prepared the draft amendments for submission to MEPC 74, with a view to approval.

- Draft Joint MSC-MEPC Circular on Delivery of compliant fuel oil by suppliers
 - The Sub-Committee finalized the draft circular addressing the delivery of compliant fuel oil by suppliers

- Amendment to the Guidelines for PSC under the revised MARPOL Annex VI.
 - Due to the time constraint, the Sub-Committee updated guidelines related to Reg.14 (SOx) only. As other regulation in MARPOL Annex VI (NOx, Incineration and Energy efficiency) are needed to be reflected in the guidelines, the Sub-committee invited Member states to submit comment documents at MEPC 74

- Unified Interpretation(UI) on carriage ban of non-compliant fuel for emergency equipment. (MARPOL Annex VI, Reg.14.1 which will enter into force 1st MAR. 2020)
 - Having considered whether emergency equipment is applied to the prohibition on the carriage of non-compliant fuel oil on board a ship, the Sub-Committee prepared a draft UI to Regulation 14.1 of MARPOL Annex VI as below:
"Reg. 14.1 of MARPOL Annex VI for prohibition on carriage of non-compliant fuel oil should be applied to the fuel oil of emergency equipment."



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2. Amendments to EGSC Guidelines (Agenda 11)

- Amendment to the Guidelines
 - As there was no sufficient time to discuss all sections in this guidelines, the Sub-committee agreed to discuss at next session of PPR, with a view to finalizing the work.
- Form of SECC (SOx Emission Compliance Certificate)
 - The Sub-Committee considered whether the word "Should" should be retained in the form of SECC and agreed to replace the word "shall" with "should" in line with usual IMO practice for instruments of recommendatory nature.
- Draft Guidance on malfunction of EGCS
 - The Sub-committee requested the IMO Secretariat to submit a draft circular to MEPC 74 for further consideration.

3. Ban on HFO for use and carriage as fuel by ship in Arctic Water (Agenda 12)

- Definition of Heavy Fuel Oil
 - The Sub-Committee agreed with a definition of HFO in Arctic Water as below and concurred that it is needed to be amended in light of 2020 Fuel oil Sulphur Cap.
 - "Heavy fuel oil means fuel oils having a density at 15°C higher than 900 kg/m³ or a kinematic viscosity at 50°C higher than 180 mm²/s"*
- Draft methodology to analysis impacts of ban on HFO in Arctic water.
 - The Sub-Committee agreed with the 5 step methodology as below
 - (Step 1) Defining the scope
 - (Step 2) Defining a policy objective
 - (Step 3) Policy Option
 - (Step 4) Analysis of Impacts



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(Step 5) Comparison of policy options and recommendation of preferred option(s)

- Furthermore, the Sub-Committee agreed to establish the Correspondence Group for developing the draft guidelines on mitigation of risks of use and carriage of HFO as fuel by ships in Artic Water.

4. Safety and pollution hazards of chemicals and preparation of consequential amendments to the IBC Code (Agenda 3)

- The Sub-Committee reviewed the outcomes of 24th (Oct. 2018) Working Group on ESPH (Evaluation of Safety and Pollution Hazards of Chemicals) and agreed to include 4 new products in list 1 and 3 and
 - List 1(Pure or technically pure products and mixtures assessed as a whole) : Alkylphenols (C10-C18, C12-rich)
 - List 3(Traded named mixtures presenting safety hazards) : SD-4820, SI-4126, SI-4154
- Clarification on the implementation of MEPC.2/Circ.
 - The Sub-Committee prepared the revised MEPC.1/Circ., including the carriage requirements for 4 paraffin-like products included in list 1 of MEPC.2/Circular for submission to MEPC 74, with a view to approval. Furthermore, the Sub-Committee clarified that above 4 renamed paraffin-like cargoes and its carriage requirements shall be applied on or after date of entry into force of the revised chapter 17 of the IBC Code, which is expected to be 1 Jan. 2021.
 - *"n-Alkanes(C10-C20)", "Paraffin wax, highly-refined", "Paraffin wax, semi-refined" and "Hydrocarbon wax"
- Revision of 2011 Guidelines for the carriage of blends petroleum oil and biofuel. (MEPC.1/Circ.761)
 - The Sub-Committee concurred with a proposal to convert all references to



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"petroleum oil" to "MARPOL Annex I cargo", since MEPC 73 has agreed that, when carrying energy-rich fuels listed in annex 12 of the MEPC.2/Circular 24, the requirements of Annex I of MARPOL should apply.

- A final draft MSC-MEPC Circular on revised guidelines for the carriage of blends of biofuel and MARPOL Annex I cargoes will be forwarded to MEPC 74 and MSC 101 for subsequent approval.

5. Unified Interpretations (Agenda 16)

- o The Sub-Committee agreed with the following Unified Interpretations(3 UI)sand these will be forwarded to the MEPC 74, with a view to approval.

- **Regulation 13.2.2 of MARPOL Annex VI** (Requirements for application date of additional installation or replacement of non-identical marine diesel engine)

This UI reflected the amendment to the MARPOL Annex VI with regard to the NOx Emission Control Areas (Baltic Sea and North Sea) which will enter into force on 1 Jan. 2021.

- **Regulation 16.9 of MARPOL Annex VI** (Requirements for incineration)
[Reg. 16.9] *For incinerators installed in accordance with the requirements of paragraph 6.1 of this regulation the combustion chamber gas outlet temperature shall be monitored at all times the unit is in operation. Where that incinerator is of the continuous-feed type, waste shall not be fed into the unit when the combustion chamber gas outlet temperature is below 850°C. Where that incinerator is of the batch loaded type, the unit shall be designed so that the combustion chamber gas outlet temperature shall reach 600°C within five minutes after start-up and will thereafter stabilize at a temperature not less than 850°C.*



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[UI on Reg. 16.9]

For the application of this regulation, the term "waste shall not be fed into the unit" should be interpreted as follows:

→ *For continuous-feed incinerators solid waste shall not be fed into the unit when the combustion chamber flue gas outlet temperature is below 850°C. Sludge oil generated during normal operation of a ship should not be regarded as waste in connection with this regulation, and can be fed into the unit when the required preheat temperature of 650°C in the combustion chamber is achieved.*

For the application of this regulation, the term "the unit shall be designed so that the combustion chamber gas outlet temperature shall reach 600°C within five minutes after start-up" should be interpreted as follows:

→ *Batch loaded incinerator should be designed so that the temperature in the actual combustion space where the solid waste are combusted should reach 600°C within five minutes after start-up."*

- **Regulation 13.5.3** (Recording requirements for NOx Tier Mode)

[Reg. 13.5.3] The tier and on/off status of marine diesel engines installed on board a ship to which paragraph 5.1 of this regulation applies which are certified to both Tier II and Tier III or which are certified to Tier II only shall be recorded in such logbook as prescribed by the Administration at entry into and exit from an emission control area designated under paragraph 6 of this regulation, or when the on/off status changes within such an area, together with the date, time and position of the ship.

[UI on Reg.13.5.3]

For the application of this regulation:



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- .1 "marine diesel engines installed on board a ship to which paragraph 5.1 of this regulation applies" includes additional or replaced engine installed on or after the relevant emission control area takes effect;
- .2 "certified to Tier II only" means a Tier II engine that is installed onboard a ship which is constructed on or after the emission control area where the ship is operating takes effect;
- .3 Tier II engines stipulated under the Tier II requirement of regulation 13.4, i.e. Tier II engines installed onboard a ship constructed before the entry into force of the emission control area where the ship is operating, are not considered to be a "Tier II only" engine in the context of record keeping. Such exclusion is extended to Tier II engines replaced after the entry into force of the relevant emission control areas onboard ships of this category, if the replacement engines meet resolution MEPC.230(65);
- .4 if an engine installed on a ship constructed before the entry into force of the emission control area where the ship is operating has undergone a major conversion as described in regulation 13.2.1, those engines are to be Tier III engines; thus the above interpretation in .1 above applies; and
- .5 recording is required for the Tier II engine operation in a NECA under the exemption according to regulation 13.5.4.

6. Consideration of the impact on the Arctic of emission of black carbon(BC) from International shipping (Agenda 7)

- o The Sub-Committee reviewed the following 41 control measure identified by correspondence group and agreed that it had completed planned work* with regard to this agenda and consequently invited to MEPC to provide instruction on further works.
 - Fuel type (8)
 - Fuel treatment (2)
 - Exhaust gas treatment (9)



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- Engine and propulsion system design (6)
- Ship design (2)
- Operational measures (6)
- Regulatory measures (6)
- Others measure (2)
 - *1. Development a Definition of BC emissions from international shipping (MEPC 68)
 - 2. Finalization of the reporting protocol to collect data and identification of the most appropriate measurement methods (PPR 5)
 - 3. Consideration of proposals and finalization of the appropriate control measures (PPR 6)

7. Amendments to Anti-fouling System Convention (Agenda 6)

- o The Sub-Committee agreed to the draft amendments to Annex 1 (Control on Anti-fouling systems) to the AFS Convention to include control on cybutryne for consideration by MEPC 74, with a view to approval.
 - Application : Ships should not apply anti-fouling systems containing cybutryne from 3 Oct. 2021 and should either not bear or seal such anti-fouling systems from 3 Oct. 2026.
 - Subsequent amendments to be needed
 - 1. Guidelines for brief sampling, survey and certification, and inspection of anti-fouling system on ships (MEPC.Res.104(49), MEPC.Res.195(61) and MEPC.Res.208(62))
 - 2. Guidelines related to London Convention and Inventory Hazardous Materials under the Hong-Kong Convention.

8. Review of the IBTS Guidelines and amendments to the IOPP Certificate and Oil Record Book (Agenda 13)

- o The Sub-Committee reviewed some items on IBTS Guidelines and orally agreed that a ban on evaporation and installation of 15 PPM Alarm for discharge of clean drain are necessary.



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- The Sub-Committee also agreed to develop the consolidated IBTS Guideline and establish inter-sessional Correspondence Group for further consideration.

9. Amendment to Guidelines for Sewage Treatment Plant (Agenda 14)

- The Sub-Committee reviewed the proposed amendments to 2012 Guidelines on implementation of effluent standards and performance tests for sewage treatment plant and a revision of the regulations MARPOL Annex IV, such as introduction of sewage records and sewage management plan.
- However, since the proposed amendments to MARPOL Annex IV were beyond current work scope of this Agenda, the Sub-committee agreed to await the result of MEPC 74 on proposal to expand the work scope for reconsidering this matter at next session of PPR.

P.I.C:

Park Yun-chan / Senior surveyor

Convention & Legislation Service Team

Tel: +82 70 8799 8326

Fax: +82 70 8799 8319

E-mail: convention@krs.co.kr


**General Manager of
Convention & Legislation Service Team**

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