

Circular From GARD**Date: 14 August 2018****Port state control to focus on ship emissions**

The agreement by major PSC regimes to conduct concentrated inspection campaigns on compliance with MARPOL Annex VI on the prevention of air pollution from ships serves as a timely reminder ahead of the entry into force of the 2020 global sulphur cap.

The **Paris MOU**, **Tokyo MOU**, **Indian Ocean MOU** and **Black Sea MOU** port state control (PSC) regimes have agreed to focus on the **prevention of air pollution by ships** during their forthcoming concentrated inspection campaigns (CICs). The CICs will be carried out between **1 September 2018** and **30 November 2018** and the Port State Control Officers (PSCOs) will pay particular attention to visiting ships' compliance with MARPOL Annex VI during regular PSC inspections.

The tailored CIC checklist/questionnaire to be used by attending PSCOs will reportedly be published in August 2018. However, as some PSC regimes have recently **announced** that they will take enforcement of the new 2020 global 0.5% sulphur cap seriously from "day one", the CIC may be considered a good opportunity to create awareness on the forthcoming requirements. Ship operators should therefore not be surprised if verification of the sulphur content of the onboard fuel is requested as part of the CIC. This could include a review of documents, such as bunker delivery notes, oil record books, fuel logs and fuel changeover procedures, as well as the taking and analysis of fuel samples at short notice. The "**Sulphur Inspection Guidance**" published by the European Maritime Safety Agency (EMSA) contains useful information on what to expect from an attending PSCO.

It is, however, important to bear in mind that sulphur oxides (SO_x) contained in ships' exhaust gas is not the only air pollutant regulated by MARPOL Annex VI. The convention limits emissions of nitrous oxides (NO_x) and prohibits the deliberate emission of ozone depleting substances (ODS). It also regulates shipboard incineration of waste material, and the emissions of volatile organic compounds (VOC) from tankers.

Members and clients are encouraged to familiarise themselves with the relevant MARPOL Annex VI regulations and CIC criteria in well before 1 September 2018. Based on experience from previous CICs, it is assumed that the questionnaire will focus on the maintenance and working condition of relevant equipment, such as the incinerator, but will mainly contain operational questions aimed at verifying the crews' familiarity with the ship-specific equipment and procedures. As much of the compliance with MARPOL Annex VI is documented by significant recordkeeping, it will be important to ensure that that all MARPOL Annex VI documentation is complete and up-to-date prior to entry into any port.

Other CICs in 2018

Members and clients with ships trading to Latin America are likely to be aware of the ongoing CIC in

the **Vina Del Mar MOU** region. This CIC, which started on **1 June 2018** and will end on **31 August 2018**, focuses on the **safety of auxiliary machinery installations** and compliance with SOLAS Chapter II-1. Attending PSCOs are paying particular attention to the maintenance and working condition of engines and their related equipment and alarm systems, as well as to the familiarity of the crew with safety and emergency procedures for these systems. The PSCOs use a questionnaire of 12 selected items to verify critical areas for the auxiliary machinery installations. A copy of the questionnaire is available [HERE](#).

Furthermore, the **United States Coast Guard (USCG)** has initiated a CIC for all **US-flag vessels fitted with open lifeboats**, running from **2 May 2018** to **1 May 2019**. The purpose of this CIC is to ensure that these critical lifesaving appliances are maintained in a proper working order and ready for immediate use. The official press release and checklist with nine items is available [HERE](#).

According to the **Caribbean MOU's** 2017 Annual Report, one of the main items approved at its 22nd committee meeting in June 2017 was: "*No Concentrated Inspection Campaign for 2018*".

Related PSC MOU websites

- Paris MOU: www.parismou.org
- Tokyo MOU: www.tokyo-mou.org
- Black Sea MOU: www.bsmou.org
- Indian Ocean MOU: www.iomou.org
- Viña del Mar Agreement: sites.prefectura naval.gov.ar
- Caribbean MOU: www.caribbeanmou.org
- United States Coast Guard: www.uscg.mil
- Abuja MOU: www.abujamou.org
- Riyadh MOU: www.riyadhmou.org
- Mediterranean MOU: www.medmou.org

Source of Information: Gard P&I Club