Circular From NORTH
Date: 29 September 2018

China: Emission Control Areas *Update*

Update: Early Implementation of Fuel Sulphur Regulations in Yangtze River Delta ECA.

The Maritime Safety Administrations (MSA) of Shanghai and Zhejiang have issued notices on the requirements to use fuel with 0.5% maximum sulphur content at all times within the Yangtze River Delta emission control area.

Local correspondents Huatai - who have issued circular PNI 1814 - advise that from 1st October 2018 vessels are to use fuel with sulphur content of no more than 0.5% m/m when they enter into the emission control area (ECA) and when at any berth or anchorage. This means that vessels must change over onto compliant fuel in sufficient time prior to entering the Yangtze River Delta ECA.

It is understood that vessels connecting to shore power receiving facilities are exempted from this requirement. Vessels may also use exhaust gas cleaning systems (scrubbers) to satisfy the new emission control requirements.

Vessels will need to apply in advance to the appropriate regional MSA for any exemptions on using non-compliant fuel.

We understand the situation in the Bohai Bay ECA and Pearl River Delta ECA remains unchanged and the requirement to use compliant fuel at all times within these ECAs will take effect on 1 January 2019.

Preparing for the Switch - Have a Plan

There are notable risks when changing over from 'high sulphur' heavy fuels to 'low sulphur' distillates and vice versa when at sea. It is strongly recommended that Members review and update their vessels' procedures for this task.

Think about:

- Heavy fuel oil requires heating whereas distillates such as marine gas oil generally do not. It is important to control the rate of temperature change when changing between these fuels.
- Ensure fuel oil spill returns from engines and other equipment are properly routed to avoid contamination of tanks.
- Changeover procedures must be workable and practical.
- Crews are trained and practice fuel changeovers - they fully understand the process and consequences of getting it wrong.
- When there are two fuels mixing in the supply line, there may be compatibility issues which can lead to the formation of sludge and block the pipework. It is advisable to carry out compatibility tests

between the different fuels on board before use.

- There may be a need to undertake modifications to the vessels and its systems, such as fuel treatment arrangements. There will be a need for adequate storage capacity for the various grades of fuel and the suitability of the tanks must be assessed, such as protection from heat sources.
- Consider sending distillate bunker samples for laboratory testing and if operating in cold climates, know the cold flow characteristics of the fuel. Distillates can be adversely affected by the formation of wax in cold weather conditions and the fuel specification should be checked for cloud point and cold filter plugging point.
- If possible, carry out the changeover operations away from busy traffic areas and coastal areas.

Source of Information: North of England P&I Club