

Circular From NORTH

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No Scrubs: More Ports Declare Ban on EGCS Discharges

Singapore has joined the list of ports that will ban the use of open loop scrubbers in their waters.

Exhaust gas cleaning systems (EGCS) - more commonly referred to as scrubbers - are an accepted equivalent measure in complying with the IMO 2020 global sulphur cap. The use of scrubbers has split the shipping industry. Ports around the world are looking at the impact of scrubber use in their waters.

A number of ports and regions have already stated that they will not allow the discharge of washwater from scrubbers.

The table below summarises North's understanding of the positions taken by ports that have or will prohibit the use of scrubbers, or have placed conditions on their use.

This information is to the best of our knowledge and is for guidance only. For up to date and definitive information, contact the local authorities or agents.

Country	Port	EGCS discharge allowed?	Comments
Belgium	All	No	Belgian federal law states discharge only allowed in coastal and open seawaters when at least 3nm off coast. Discharges must not imperil EU Water Framework Directive objectives. Flemish regional law also confirms discharge not allowed in ports or inland waters.
Germany	Inland Waterways, canals and ports within inland waterways	No	See the Convention on the Collection, Deposit and Reception of Waste Produced during Navigation on the Rhine and Inland Waterways (CDNI). https://www.cdni-iwt.org/de/faq/divers/
Ireland	Dublin	No	Refer to Port of Dublin's NOTICE TO MARINERS No. 37 of 2018 Prohibition on the Discharge of Exhaust Gas Scrubber Wash Water .
Singapore	Singapore	No	Ban on the use of open loop scrubbers expected to take effect on 1 January 2020.

Latvia	All Ports	Conflicting advice	EUROPEAN COMMISSION REPORT (2016): Allowed - no restrictions, but national authorities are of the position that open-loop scrubber discharge should be prohibited in territorial waters and ports. ABS Report (2018): Prohibited in port waters. Correspondents Pandi Balt Ltd advised in August 2018 that washwater discharges currently allowed under regulations but likely to be prohibited in future.
Lithuania	All Ports	Conflicting advice	EUROPEAN COMMISSION REPORT (2016): Allowed - no restrictions (in accordance with IMO Washwater Guidelines MEPC 184(59)). ABS Report (2018): Prohibited in territorial waters and ports We understand Lithuanian authorities are studying whether EGCS wash water discharges have serious impacts on the marine environment or not. When results will be clear, conclusions will be provided.
United States	Californian Ports and Waters	No	The Californian ARB OGV regulations stipulate only distillate fuels can be used to comply with the 0.1% sulphur limit Changeover to compliant distillate fuel (MGO or MDO) prior to entering Californian waters.
United States	Connecticut Ports and Waters	No	Discharge of exhaust gas scrubber washwater into Connecticut waters from any vessel is prohibited. VGP 2013: 6.5.9 Discharge of exhaust gas scrubber washwater into Connecticut waters from any vessel covered under the VGP or sVGP is prohibited. This condition is necessary for compliance with CGS section 22a-427, Standards No.1, 2, 9, 12, 14, 15, and 24 of the CT WQS.
United States	Hawaii Ports and Waters	Yes - conditional	Additional requirements under VGP 2013 Section 6.6. The State of Hawaii (Clean Water Branch) issued 'Blanket Section 401' Water Quality Criteria (WQC). This covers 27 categories of effluent discharge from an applicable vessel (EGCS washwater being one) that have received the best control or treatment into waters of the State of Hawaii incidental to the normal operation of the applicable vessels.
United Arab Emirates	Abu Dhabi Ports	Yes - conditional	<u>Abu Dhabi Ports Company Policy</u>: Sludge generated from exhaust gas scrubber washwater discharge must not be discharged into port waters. Exhaust gas scrubber washwater discharge may only be discharged in port waters if free from pollutants. Any exhaust gas scrubber sludge should be discharged from a vessel to an ADPC licensed waste disposal contractor.

North recently asked the Exhaust Gas Cleaning System Association (EGCSA) to take part in a short Q&A. Our Signals article on this can be read [here](#).

Source of Information: North of English P&I Club

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